Chapter 6
Protecting Forests, Communities, and Property Access

This chapter includes three main sections: Protecting Forests (Question 3), Protecting Communities (Question 4), and Protecting Access to Property (Question 5).

Protecting Forests (*Question 3*)

Question 3: Protecting Forests. How should inventoried roadless areas be managed to provide for healthy forests, including protection from severe wildfires and the buildup of hazardous fuels as well as to provide for the detection and prevention of insect and disease outbreaks?

This section includes five subsections: Natural Disturbance Processes and Forest Health General, Roads/Access, Timber Removal, Fire Management, and Insects, Disease, and Noxious Plants.

Natural Disturbance Processes and Forest Health General

Summary

General Comments – A number of respondents comment about forest health management in general. Some suggest using the precautionary principle, or managing forest health according to land use designations and management restrictions. Others ask the Forest Service to focus forest health management efforts in roaded areas rather than roadless areas where some believe the need is more urgent Another individual suggests that wilderness areas cannot be properly managed for forest health because these areas promote fire and insect and disease outbreaks.

Respondents also comment about forest health management strategies. Several suggest that the Forest Service develop a detection and prevention strategy for natural disturbance events. Others suggest the Forest Service have contingency plans in place to act quickly to manage disease, blowdown, and wildfires. One individual proposes the Forest Service develop plans and strategies similar to those used by the Federal Emergency Management Agency.

Several respondents suggest engaging local non-profit groups to help with forest health management activities. Others say that forest health management should be left to professional Forest Service personnel.

Many respondents comment about forest health, specifically as it relates to roadless area management. A number of people suggest making forest health a top priority, allowing decisions

to be made at the local level, and protecting adjacent lands from insects, disease, and fire. A few individuals state that the Forest Service should manage forest health in roadless areas no differently than in the rest of the forest. One individual asserts, "The RACR does not preclude employment of management actions to control insects and diseases which may occur in IRA, nor does it preclude fire/fuel management strategies within the National Fire Plan."

Adequacy of Analysis –A number of respondents ask for more in-depth analysis, particularly with respect to forest health. This includes requests to inventory forest health at the local level and to fully disclose the consequences of various management strategies, and to continuously collect forest health data. Some organizations suggest the Forest Service use roadless areas as a baseline to gauge the effects of management techniques on forest health in other areas. A few respondents suggest the Forest Service provide evidence that the Roadless Area Conservation Rule will have a positive effect on fire and forest insect management, or provide studies to support the claim that thinning small-diameter trees will restore ecological processes, provide habitat for endangered species, and avert catastrophic wildfire.

Some respondents comment about concepts related to forest health. Some would like the Forest Service to define the terms "healthy" and "forest health." One individual states, "First, we must define a healthy forest. Healthy according to whom?" Others state that forest health may be defined according to the management objectives at each forest site. One individual suggests the Forest Service define temporary and short-term forest health treatments. Several respondents recommend the Forest Service acknowledge the concept of natural disturbance regimes.

Funding – One individual advises the Forest Service to consider that policy changes and attendant litigation have cost a great deal of money that could have gone to forest health treatments. Another individual states that there should be a process in place where litigants are held responsible for damages to the environment that happen when lawsuits prevent health management activities from occurring.

Management – In general, people recommend either 'active management' or 'ecosystem/restoration management.' Respondents state that the Forest Service should actively manage resources in roadless areas. Suggested active management practices include timber removal, managed fire, and insect control. (See also subsequent sections on fire management and insects, disease, and noxious plants.) Other respondents suggest that the Forest Service utilize best management practices and work to restore forest health. One individual suggests the Forest Service use conditions that existed prior to Euro-American contact as a baseline for management.

Other respondents assert that forest processes such as fire and insects and disease outbreaks should be allowed to run their natural course. People state that these elements are part of the natural forest stand replacement cycle and should not be suppressed or controlled. Respondents also say that human activities, such as road access and timber removal, cause more damage than natural processes.

One individual states, "The so-called 'exceptions' to the road building and timber harvest prohibitions are too narrow to provide the needed flexibility." This person suggests that these exceptions will foster more litigation and that the needed flexibility can be provided by allowing local forest supervisors to tailor forest plans to respond to local circumstances. Another individual requests that the Forest Service define specific national criteria for management exceptions requiring roads in designated roadless areas. On a similar note, one respondent

suggests the Forest Service constrain exceptions to the Rule with specific conditions and restrictions.

Forest Health Management General

1412. Public Concern: The Forest Service should follow the precautionary principle.

TO DECIDE IF ADDITIONAL TIMBER REMOVAL WILL IMPROVE FOREST HEALTH

The US has signed a number of international treaties invoking the Precautionary Principle, which says in essence: **"When there is a significant probability of harm to the environment or to human health, it is not necessary to have 100% proof of harm to justify preventive and corrective actions."** The Forest Service should follow the Precautionary Principle as they decide if more logging will improve the health of the forests. (Individual, Spokane, WA - #A23849.30100)

TO MANAGE THESE AREAS MINIMALLY

Use the Precautionary Principle and "manage" these areas minimally. Indeed "manage" is the wrong word, since we do not manage the forests; we influence and impact them, they manage themselves. Since the roadless areas have likely been "managed" minimally, they should be left for future generations as reference areas, in humble admission that our forestry is ignorant of many subtle ecosystem dynamics, and that our management is still incapable of appreciating and integrating the diverse social and economic interests in our forests. Indeed, insufficient time has passed since true old growth ecosystems, especially in the West, were first clearcut to know whether they do grow back as they were. The whole notion of a decadent forest is outdated. The latest research from the Wind River station shows that old growth forests continue to function as carbon sinks. (Individual, Cleveland, OH - #A26411.30100)

1413. Public Concern: The Forest Service should manage forest health according to land use designation and management restrictions.

IRAs should be managed according to how they are allocated. If they're allocated to non-developmental uses (such as roadless recreation or recommended wilderness) they can be prescribed burned to prevent the buildup of hazardous fuels. If they're allocated to developmental uses, they can be logged, thinned or prescribed burned. (Individual, Libby, MT - #A2301.30510)

ALLOW MORE OPTIONS FOR MANAGING FOREST HEALTH IN ROADLESS AREAS THAN IN WILDERNESS AREAS

Emphasizing that areas identified to continue as unroaded, non-wilderness areas should not be managed as pseudo-wilderness, the options for controlling wildfire and insect/disease outbreaks should be much greater compared to wilderness areas (e.g., use of chainsaws, motorized equipment, and aircraft). Also . . . noted above, many forest management activities may be feasible/desirable within the scope of the purpose of these unroaded areas to help prevent the buildup of hazardous fuels and insect/disease outbreaks (e.g., prescribed fire, thinning, aerial spraying). (State Agency, Saint Paul, MN - #A30025.30200)

1414. Public Concern: The Forest Service should focus its management efforts on roaded areas rather than remote roadless areas.

Given limited resources, how can the Forest Service conserve managed landscapes? The Forest Service seems confused about where the controversy lies. Relatively speaking roadless lands are not controversial. The data and public opinion supports the status quo. In contrast, managed Forest Service lands are in poor to fair ecological condition, despite billions of dollars of public expenditure over the past sixty years. How the US Forest Service managed those lands will largely determine agency efficacy and viability, and perhaps the credibility of the forestry professional as well. (Individual, Colville, WA - #A20889.12120)

BY TREATING FOREST HEALTH IN ROADED AREAS

The agency should focus its efforts where they are needed most urgently, in roaded areas, not roadless areas. Most of the areas that are at greatest risk of unnaturally intense fire or excessive mortality due to insects and disease are in already roaded areas. The areas where fire risk is greatest are low elevation forests that evolved with frequent low intensity fires that burned the under-story below larger trees. These areas were also most heavily logged and roaded. Roadless areas on the other hand, are often at higher elevations and moister and wetter than roaded areas. They evolved with longer fire intervals, thus the effects of fire suppression and past timber management have not been as acute.

Furthermore, even in roadless areas where forest health concerns do exist, the Forest Service ought to be very careful to not trade one environmental liability—the effects of constructing new roads in roadless areas—for another—treating forest health. Exchanging one liability for another is not good public policy. (Organization, Arlington, VA - #A23474.30100)

Applying effective fire suppression/exclusion results in an increase in fuel hazards and potential fire severity, and a decrease in biological diversity and ecological integrity. The forests most in need of vegetation and fuels treatments to reduce fire hazards, insect and disease outbreaks, and restore biological diversity are not roadless areas, but rather, areas that have already been roaded and logged. Building roads allegedly for the purpose of "forest health restoration" or "fire hazard reduction" only makes sense if mechanical thinning treatments are being proposed. However, the use of mechanical thinning as a tool for fire hazard reduction is highly controversial, scientifically unsubstantiated, and fundamentally experimental in nature. Unfortunately, it appears that mechanical thinning is becoming yet another euphemism for industrial-scale commercial logging-one of the prime management activities that degrade ecosystems and cause forest health/fire hazard problems.

In some instances, it has been demonstrated that commercial thinning treatments intended to reduce fire hazard have actually had the opposite effect. Although gross tonnage of fuels may have been reduced, there has been a net increase in hazardous fine fuels accumulating on the surface and available for burning-primarily logging debris or "slash." Also, changes in microclimate from tree removal serves to increase solar radiation and wind penetration, which in turn increases site flammability following thinning treatments. (Organization, Eugene, OR - #A30352.30500)

Extensive management of these areas is not economically possible or logical. The only logical solution to protecting forest health in general is to manage species and spacing in the already roaded and logged areas, wherever extensive forest management is possible. This will reduce fuel loadings on the forest floor and ladder fuels that lead to catastrophic, stand replacement fires. These fires result in wholesale water quality and wildlife devastation in addition to the huge fire fighting costs, and loss of homes, property and lives. This same management is definitely not appropriate for roadless areas, however, which should be managed as wilderness, since this is what they are and is most cost effective. (Individual, Olympia, WA - #A20849.30200)

Fires in unroaded areas are not as severe as in roaded areas because of less surface fuel. Many of the fires in the unroaded areas produce a forest structure that is consistent with the fire regime, while the fires in the roaded areas commonly produce a forest structure that is not in sync with the fire regime. Fires in the roaded areas are more intense, due to drier conditions, wind zones on the foothill/valley interface, high surface-fuel loading, and dense stands (Hann et al.1997).

Frost (1999) expands:

As summarized earlier in this paper, scientific assessments conducted for federal lands in several western regions generally agree that previously roaded and logged areas should be the highest priority for fuels reduction and forest health treatments (SNEP 1996, FEMAT 1993, Hann et al. 1997). (Organization, Missoula, MT - #A613.30500)

BY RESTORING ROADED AREAS TO SUSTAINABLE LEVELS

The benefits of managing forests to reduce the potential for large scale natural disturbance are undeniable. Given that these natural systems, for example the ponderosa pine forests of the Interior

Columbia Basin, have been put in a position well outside the range of historic variability, it is necessary that active management be used to return them to a sustainable condition. However, given certain budgetary constraints to accomplish such work, the currently roaded areas are of far greater priority than are roadless areas. When all or most of the roaded areas have been restored to sustainability, then it's time to begin focusing on the roadless areas. First tools for consideration should be pre-commercial thinning and prescribed fire. Commercial logging should be used as a last resort to achieve the desired conditions. (Individual, La Pine, OR - #A30048.30100)

BY CONSULTING WITH LOCAL SUPERVISORS, STATES, COMMUNITIES, AND TRIBES

We believe that local supervisors, in consultation with states, communities, and tribes, should focus their planning attention on proper harvesting in areas already roaded, and on means of improving forest health without building additional roads in inventoried roadless areas.

The existing rule allows for exceptions [for] wildfire protection and forest health and local supervisors should be given narrow authority to grant such exceptions in consultation with state, Tribal and local government and other federal agencies. (Individual, Olympia, WA - #A8793.13130)

1415. Public Concern: The Forest Service should consider that wilderness areas cannot be properly managed for forest health.

Wilderness areas cannot be properly managed. They become a threat to citizens and private property owners. No vehicles are allowed in the areas and no hazardous ground fuels can be cleared which promotes fire danger as well as disease and insect outbreaks. (Individual, Pencil Bluff, AR - #A22117.30100)

1416. Public Concern: The Administration should clarify its position on natural disaster management.

The Bush administration needs to clarify its position on natural disaster management. In some cases, such as along the Mississippi River, the current administration threatens towns and communities with the removal of federal disaster relief. Yet, this summer the federal government has spent millions of dollars and six fire fighters have died attempting to put out blazes. The only common thread is an anti-environment tone from the Bush administration. People that want to protect their environment are punished while those that destroy it are supported with my tax dollars. (Individual, Boulder, CO - #A26520.15000)

1417. Public Concern: The Forest Service should not allow excessive support for short-term visual values to prevent the implementation of forest health treatments.

Values should then be synthesized with the value of forest health needs. That connection is highly important as excessive support for short-term visual values can and does prohibit the implementation of treatments that result in healthier forests. Aquatic and vegetative values must be applied in a balanced manner. (Organization, Moscow, ID - #A25639.45000)

Forest Health Management General – Management Strategies

1418. Public Concern: The Forest Service should develop a detection and prevention strategy for all natural disturbance events.

BY DEFINING THE EXPECTATIONS OR PROCEDURES IN THE FOREST PLAN AND ASSOCIATED RESOURCE PROGRAM PLANS

You question how the inventoried roadless areas should be managed to sustain their health, including wildfire protection? It is interesting that your agencies and the Universities that train your people should need to answer this question. The problem I see is a lack of a lot of alternatives for many ecosystems based on the situations created by the decisions and the willingness of the American Taxpayer to pay. I don't believe the agency has been at all truthful about the short and long term outcomes or expectations

from various regimes of management in some ecosystems, there has been a great effort to sell effects based on what you believe people want to hear. In particular your decision to use something as unanchored as "ecosystem management" is an example of the Services searching for results without knowing what they will be. If there were conflicts about expected outcomes over a long term of time the agency has acted as though all things were possible. That might be true over some sort of array in space and time, but most people were evaluating things within their relatively short life span in relation to the normal western forests. It is unfortunate, but I believe most of the public's view of the forest is a series of what I call Kodak moments. There is little comparison with things that change about the Forest over time. Those of us that worked on and studied forests, their various interactions and visit the same areas many times see how really quickly things about a forest change. The changes if not treated or altered at appropriate times actually preclude a number of alternatives and in some cases limit treatments or even publicly acceptable decisions.

That is unless "mother natures" great excuse, burns through and restarts the alternatives on another decision path. As a public agency with many conflicting elements I find it hard for the agency to make any promised outcomes that are based on a time dependant set of events. That concept seems poorly understood and even more poorly portrayed in your decision documents. To have a public accept your decisions you must portray that you know and understand the various decision paths and the consequences of not getting certain things implemented. The obvious thing is that some members of the public can accept dead trees from the numerous perturbances in the Forest. The most obvious thing that is seldom really discussed is how these alter and influence management outcomes. Areas managed for timber production that are burned or insect affected have a presumed waste, yet that process in a wilderness is looked at as naturally acceptable because that apparently is how that system currently functions naturally. It meets one goal but foils another.

It is imperative that every area of National Forest has the detection and prevention strategies for all the natural perturbance events such as fire and disease or insects. The expectations or procedures should be defined in the Forest Plan and associated resource program plans. (Individual, Cambridge, ID - #A11714.30100)

BY INCLUDING DESCRIPTIONS OF HOW DISTURBANCES ARE ALLOWED OR ARE PURPOSEFULLY CARRIED OUT IN PLANS FOR ALL ROADLESS AREAS

Providing sustainable healthy forests should be the goal of all management. Our western forests are disturbance dependent, therefore plans for all Roadless areas must include descriptions of how such disturbance may be allowed or purposefully carried out. Such disturbances will logically favor orderly timber harvest and subsequent post harvest measures, slash disposal, site preparation, reforestation, and stand stocking control. Road access may be provided by some permanent roads as well as temporary 'roll up roads'.

Prescribed fire or naturally ignited fires burning under prescription can also be used to reduce forest fuels, but such means often results in leaving large volumes of dead but unconsumed trees standing and down.

Stand examination and other inventories must be made, and all existing and predicted future conditions must be accurately described and mapped. Only then can officials bring forth the data and provide necessary analysis to the interdisciplinary team and the public. (Individual, Manhattan, MT - #A21848.30520)

1419. Public Concern: The Forest Service should have contingency plans in place to act quickly to manage disease, blowdown, and wildfires.

INCLUDING PREPARATION OF AN EIS

The Forest Service should have the necessary plans and EISs in place so they can act quickly to deal with disease, blowdown, and wildfires. (Individual, Minneapolis, MN - #A8016.30100)

In exceptional cases where insects and fuels do become a hazard, an environmental impact statement for proposed action can be prepared. This was done in the Boundary Waters Canoe Area Wilderness after a 1999 storm left ten times the normal fuel buildup. (Individual, Grand Marais, MN - #A15355.30100)

INCLUDE UNEXPECTED EVENTS IN FOREST PLANS SO THE FORESTS CAN BE MANAGED EFFECTIVELY AND RESPONSIBLY

The blowdown in the Superior National Forest, I believe it was July 1999, highlights a major problem. Instead of acting quickly to salvage timber as practical and to reduce fire danger, the USDA forest service could do nothing except write environmental impact statements (EIS) for a year and a half. This inaction must be dealt with, and my suggestion is to include unexpected events in the forest plans so the forests can be managed effectively and responsibly. Having the responsibility to manage must be coupled with the authority to act. The state and local communities tend to act quickly to deal with the large blowdown, but why can't the US forest service act quickly? What needs to be done or included in the forest plan so the forest service can act quickly in the future? (Individual, Minneapolis, MN - #A8016.30500)

Even if the final designation is for roadless area designation, contingency plans must be included to allow for human intervention in case of serious fire danger, disease outbreak, human use controls, etc. (Individual, Starkville, MS - #A11715.30200)

1420. Public Concern: The Forest Service should develop plans and strategies similar to those used by the Federal Emergency Management Agency.

My view is that wildfires differ from tornados, floods, and earthquakes only in the perception that they're preventable. Even in highly-managed forests, this isn't always the case. Why not develop the same plans and strategies the FEMA uses for other disasters? (Individual, New Haven, CT - #A706.30400)

Forest Health Management General – Public Involvement

1421. Public Concern: The Forest Service should employ local non-profit groups to observe forest health conditions.

TO OFFSET THE COST OF FOREST HEALTH MANAGEMENT

The Forest Service should employ (not hire) local non-profit groups to help offset the cost of observing and keeping the forest healthy. For instance, I know a group of motorcycle riders in Montana who could tell the Forest Service exactly where the most dangerous build-up of fuels are. Their knowledge could be put to good use if only there was mechanism to receive their input. (Individual, Palmer Lake, CO - #A23361.17140)

IF THE FOREST SERVICE DOES NOT MANAGE FOR FOREST HEALTH; A LOCAL NONPROFIT ORGANIZATION SHOULD DO IT

Under such a law, forest hazard "management" (if any) should be performed by the forest service itself, or by concerned local non-profit organizations. Any for-profit enterprise involved in forest hazard management should be closely monitored, if not prohibited, for violation of a conflict of interests. (Individual, Olympia, WA - #A25533.30600)

1422. Public Concern: The Forest Service should engage other government entities to educate and advocate practices to promote forest health.

If it is responsible for managing the health of the nation's forests, then the Forest Service can not restrict itself to parcels within boundaries on a map but must include protection of the entire forest and protect it from its greatest adversary, mankind. In doing so, the Forest Service must engage not only the public but itself and other parts of the government to educate and advocate practices and policies that would promote forest health, including but not limited to: acting as the champion of the forest as an ecosystem, educating Congress about ecology and biodiversity and employing all possible means to persuade Congress to make statutory that the mission of the Forest Service is to champion the forest as ecosystems, eliminating the leasing of forest lands for grazing—a practice that has been widely documented as very destructive to forest health; working with the department of Labor and Commerce

to assist communities and small businesses economically dependent on forest use to other bases of economic viability; assuring that the EPA is fully aware of the impacts of environmental quality on forest and employing all possible means to move the EPA in directions that would promote forest health through environmental quality; advocating alternatives for all forest resource uses, especially but not limited to extractive . . . . (Individual, Nederland, CO - #A19016.15167)

1423. Public Concern: The Forest Service should not ask the public how to manage forest health on public lands.

LEAVE IT TO PROFESSIONAL FOREST SERVICE PERSONNEL

It is absurd that you would ask the general public how to manage lands that are over-run with dead timber, beetle infested pines and potential fire hazards! We pay taxes to hire trained professional Forest Service personnel with years of collective service and the know-how to deal with these issues. You know what needs to be done! (Individual, Annabella, UT - #A30323.30100)

Forest Health Management General – Roadless Areas

1424. Public Concern: The Forest Service should consider forest health when managing roadless areas.

When evaluating Roadless Areas, the Forest Service should consider:

The likelihood of catastrophic wildfire, or insect or disease outbreaks. (Individual, Des Moines, IA - #A12587.30100)

When evaluating Roadless Areas, the Forest Service should consider:

The overall health of the area. (Individual, Des Moines, IA - #A12587.30100)

BY MAKING IT A TOP PRIORITY

The health of the forest and associated lands has to be the top priority for the management of roadless areas. Other considerations have to be set aside if they interfere with the highest priority. As a country we have a very poor history trying to implement multiple use. (Individual, Ennis, MT - #A438.30100)

Let all people know the highest priority in a roadless area is forest health. The Forest Service will do as Teddy Roosevelt wanted them to do when he established the National Forests, promote forest health and allow whatever activities on the forest that will promote this goal. (Individual, Ennis, MT - #A438.30100)

I believe that the health and conservation of wilderness to be a higher priority than our consumer needs for more natural resources. Having spent much time in our Forest Service lands as a wilderness guide, I see the impact of roads, even remote roads, on the ecological systems of the area. Just putting in roads, much less the intended use of the roads, (mining, logging, etc), creates disturbances in the flow of life in a forest. (Individual, Boulder, CO - #A212.50000)

Local and regional economic interests dominate forest management policies even though these lands do not exclusively belong to these interests. Although I live in Montana, I have an equal stake in national forests in Utah to those held by Utahans, and vice versa. The vast majority of commercial logging in the U.S. occurs on privately-owned lands and the use of national forests for this purpose is no longer a legitimate use of national forests. They are not farms, they are forests. While I have no problem with certain activities, such as hunting, I see little policy difference between a roadless forest and a national park. Thus, I believe the pendulum of policy must start to swing closer to preservation than to consumptive use in our national forests. (Individual, Billings, MT - #A277.50000)

Economic interests of private corporations should have less standing than the general interests of the national policy, and the Forest Service should recognize and argue the case that the protection of many areas from logging will inevitably raise the prices for forest products from other areas that are harvested by timber companies. It is therefore in the interests of everyone to maintain large protected areas for both current environmental health and possible rotation as future sources of supply of forest products. In no case should short-term economic interests of a few take precedence over the national interest of maintaining healthy forests. (Individual, New Haven, CT - #A616.30130)

BY CONSIDERING THE HEALTH OF THE ENTIRE FOREST/REGION

It is a sunny morning and I am writing from my porch, overlooking a small patch of my forestland and that of my adjacent neighbor, U.S. Timberlands. We bought this patch of forest ten years ago as a recreation haven, for access to hiking and snowmobiling, but over the years I have learned about forest management, and now regard it as a place to respect and protect, not just to enjoy. As I watch my neighbor ruthlessly and inappropriately clearcut in mixed conifer and ponderosa pine forest, I worry about the health of the entire forest region in this area, with the resulting microclimate and ecosystem effects of such damaging timber practices.

This is private land, albeit in the questionably legal possession of a timber corporation. However, I have the same concerns about public land, which has been treated with similar disregard for forest health. (Individual, Olympia, WA - #A4929.30100)

Much of the watershed area in the western states is not forest at all but rangeland. If we do nothing to manage for resource health the resources will become weaker and the area will be invaded by species that thrive with regular wildfire. Bare ground will become the norm and healthy soils and native plants will be a thing of the past. (Individual, No Address - #A7186.65000)

BY FOCUSING ON LONG-TERM FOREST HEALTH AND ECOSYSTEM MANAGEMENT

The Forest Service has a unique responsibility in the public trust. More than most public agencies, the Forest Service's work is critical to the well-being of future generations. Long-term issues such as maintaining biodiversity and protecting ecosystems are integral to the responsibilities we entrust to you. You are stewards of a vital part of America's future, and if you can maintain that as your top priority, it will help you sort out the many competing short term economic and political pressures. You seem to have grasped some potential techniques already, such as this public comment opportunity. Work on it, keep your eye on the long-term health of our forest ecosystems. You'll figure it out. (Individual, Chestertown, MD - #A462.15110)

BY USING A STEWARDSHIP FORESTRY CONCEPT

The USFS no-burn policies of the last 100 years contributed to the unnatural build up of hazardous fuels, disease and insect infestation. Though unrealistic to return to the "natural ways" of yore, the *stewardship forestry* described in the RAC DEIS May 2000 offers a functional and scientifically sound method of keeping forests healthy. "Severe wildfires" are a part of the natural order of forest life and should return to their proper place. Insects and disease also perform natural functions, wildfires keep these two "blights" in check. (Individual, Kemmerer, WY - #A8383.30100)

BY ALLOWING DECISIONS ABOUT FOREST HEALTH TO BE MADE AT THE LOCAL LEVEL

The Forest Service should allow local forest-level decisions for forest health treatments, including timber removal to reduce the risks of wildfire, where such activities will not adversely impact roadless areas. (Individual, Laramie, WY - #A949.30520)

Protecting forests by making decisions in Washington D.C., absent the knowledge and information available on the local forest level, does not allow for adequate protection of our National Forests. Local input is critical to forest health. The few maps that were provided were incorrect because local sources were not consulted. To declare roaded area unroaded by edict, and then manage them based on that misinformation, will only result in inadequate management which then leads to additional fire danger. It also fails to allow for adequate management of other forest problems, such as disease infestations, blow downs and insects. (Organization, Yreka, CA - #A8381.30100)

Let the local managers manage the roadless areas. Where mortality strikes in stands of timber, whether it is from insect, windthrow or previous fire, it must be dealt with. The most obvious method of dealing with it is to remove it. In most, but not all cases, we think the roadless areas should be kept roadless and the timber removed by aerial means. Technology exists to do this and do it in an economical manner if it is done in a timely analysis. If the mortality is allowed by court action, what value was in the commodity is lost to deterioration. If the project ever clears all the analysis and legal hurdles, it seldom resembles what was originally proposed by the local manager who actually knew what needed to be done. And at that point the project, if in the form of a timber sale, is so deficit that it cannot pay its own way with the value of the ruined commodity. And so the fuel builds and the forests burn on what has become a predictable basis. Between 40 and 60 million acres of this situation now exists on National Forest land, with a high percentage of this in roadless areas. It has gone on for so long now it will be a major undertaking to clean the areas up. But again, you need to ask yourselves as managers of the forest, "Is it better to take an active role in management or let nature take its course?" We think you are seeing a shift in what the public thinks when it comes to forest health and fuel buildup. Look at the Bitterroot where close to 400,000 acres burned last summer. The local population has changed over the years toward the preservationist side of the scale and almost 100% of the logging has been stopped.

Now after seeing the two months of raging infernos a recent poll shows almost 90% of the locals think the fire killing timber should be removed, even in the roadless areas, in order to reduce fuel loading for the future. Of course much if the fire could have been prevented if forest health programs has been carried out. So in summary, take charge of forest health and use all the tools you have at your disposal to take good care of our roadless [areas]. (Individual, Canby, OR - #A15507.30500)

It is essential that most roadless areas remain as roadless as possible, but this should not be at the expense of forest health because according to the NFMA protection of the resources to maximize the use of those resources is extremely important. Decisions on whether a road is necessary to maintain forest health should be made on a local forest level, decisions on local forest cannot be made adequately on a national or even regional level. Even if roads are not constructed, consideration should be given to clearing hazardous fuel buildup, again on a local forest basis. (Organization, Huntsville, AL - #A13542.30200)

We think that the current role provides sufficient and appropriate general guidance for addressing concerns related to managing the health of the forest and addressing the effects of wildfire and pests. We think the plan revision process can add specifics to those general guidelines. Among other considerations, the plan revision process should:

Define the values, goal, and objectives for which each roadless area is managed. Direction for management activities related to forest health should be in harmony with the values for which the area is managed.

Identify those roadless areas where management activities to reduce the threat of wildfires will not be applied, recognize that periodic wildfire - in some cases even severe wildfire—serve to engender health forest ecosystems.

Identify thresholds of "fuel loading" that might trigger management activities to reduce the effects of wildfire, considering the effects may be more significant for certain localities than for others.

Provide that insect and disease outbreaks may be controlled when necessary to protect the values for which the area is managed, recognizing that native pests and diseases play a significant role in promoting the overall health of the forest.

Provide that eradication of recently established populations of exotic pests may be considered when outbreaks exceed an acceptable threshold.

Provide that first consideration be given to biological controls, hand control methods, and pesticides when pest outbreaks exceed an acceptable threshold. (Organization, Damascus, VA - #A17723.30100)

A blanket, national EIS diminishes local officials' flexibility to take action to prevent losses of important ecosystems due to catastrophic fires or other events. Construction of a low-impact, temporary road or

firebreak to fight a fire is preferable to a catastrophic fire that wipes out a vital ecosystem remnant. Harvesting timber infested with beetles, for example, may also require mechanical thinning to maintain forest health but that should be done with the least amount of impact possible to roadless areas. Idaho is no longer a mosaic of large ecosystems that can sustain large fires without loss of vital habitat. Today's forests are isolated fragments of once majestic ecosystems. Loss of any of these fragments to catastrophic fire could jeopardize vital wildlife and plant habitat and thus threaten the sustainability of important species. Catastrophic fire can also wipe-out backcountry transportation systems such as traditional trails and bridges. (Permit Holder, Boise, ID - #A29589.30500)

BY CONDUCTING ACTIVITIES WITH CLEAR PROCEDURES THAT ARE OPEN TO THE PUBLIC

Management actions with a clear purpose, such as maintaining fire regimes in long-leaf pine forests or removal of non-native species, may sometimes be necessary in roadless areas. In such cases, activities should be conducted with clear procedures that are open to the public. In addition, these activities should be conducted without roads and with minimum disturbance to roadless characteristics. (Organization, Washington, DC - #A18031.30200)

BY BASING MANAGEMENT DECISIONS ON ROADLESS AREAS' INDIVIDUAL CHARACTERISTICS

Inventoried roadless areas should be managed to provide for healthy forests based on their individual characteristics. That is, some roadless areas are sparsely forested on steep rocky terrain with shallow soils, while others are heavily forested on moderate terrain with deep soils. We suspect protection from insects, disease and wildfire are most important in these latter instances. They should be protected by building roads, harvesting old, overmature stands in a preemptive strike, and thinning stands with an abundance of small trees and brush in the understory which provide ladder fuels to the crowns of larger trees.

On the other hand, roadless areas with scattered stands on steep rocky slopes should be managed by leaving them alone. Insects, disease and fire can play their natural role there without unduly threatening surrounding national forest land. (Organization, Saint Anthony, ID - #A13225.30000)

There is no "one" answer as to how IRAs should be managed, since every roadless area is a distinct and unique unit. The diversity of factors that must be addressed in managing roadless areas is profound. Forest types, stand conditions, values at risk, management objectives and the context of the area in relation to the surrounding lands are among the factors that must be considered. Consequently, each IRA should be managed individually.

Since the agency must preserve the IRA in the condition it was in as of the date of the designation as a Roadless Area, any activities that significantly alter the condition of the IRA at the time of designation are prohibited. The agency should conduct forest health projects, including but not limited to timber harvest, in order to preserve the condition of the area at the time of designation.

It is unwise for the agency to let any national initiative eliminate effective tools for preserving the conditions of IRAs as well as managing other areas of the forest. (Organization, Salt Lake City, UT - #A15263.30000)

TO PROTECT ADJACENT LANDS FROM INSECT, DISEASE, AND FIRE

The health of our forests also directly impacts our ability to provide protection for communities, homes and property. Insects, diseases and fires do not recognize the artificial boundaries placed across the landscape by governments, organizations or private individuals. To effectively treat these problems and/or restore the landscape to a more resilient condition, management actions need to be planned and carried out within a landscape context which means the impacts to NFS neighbors must be accounted for. Imposing a one-size-fits-all regulation on roadless area management will inhibit the Forest Service's ability to participate in these necessary landscape restoration and risk-reduction efforts.

The CWSF [Council of Western State Foresters] believes the potential impacts of known forest health problems, fuel load problems, and fire suppression needs on adjacent landowners must be considered in the development of roadless area management decisions. Without such considerations, liability and loss of trust will again rule the day. (Professional Society, No Address - #A29920.30600)

The lands ultimately allocated to roadless status will in large measure have to be allowed to grow, mature, and decay under natural process. This does not mean that silvicultural treatments such as thinning, burning, or harvesting should not be allowed. Those activities will simply be limited to the topography and/or economics of each opportunity. Management's ability to protect adjacent roaded areas, such as plantations, rangeland, or riparian areas from insect, disease, and fire threats should be without question. With the exception of underburning and slash/piling projects, this limits much of the mechanical treatment options to the perimeter of the roadless area. Such treatments have little relative effect on the area's roadless nature, but can have great effect on maintaining the values already invested in on the adjacent roaded lands. (Individual, Bozeman, MT - #A28120.30500)

Recently in Kentucky, endangered red-cockaded woodpeckers had to be relocated, due to loss of habitat caused from insect infestation. The infected trees should have been cut and removed. "Protections" such as these are counter-productive. The Bankhead NF in Alabama is also becoming infested with beetles but the trees cannot be removed due to "protections" and access restrictions. I hear similar reports from members on many other national forests.

Diseases and insects will not remain confined to National Forests. They will spread into State, County, tribal and private lands just the same as wildfires spread into private lands. These blights know no boundaries. District offices should closely monitor the health of their forests and do whatever is necessary to prevent these problems. The old adage about "an ounce of prevention is worth a pound of cure" truly applies to forest health. (Organization, Three Rivers, CA - #A28739.31220)

A roadless area can be a liability as can a slum tenement building next to a home or business. The government lands should be the good example of stewardship and community, not the undesirable, unwanted, bad example of a neighbor. Do we need to cut a wide swath around each unmanaged piece of federal land to protect the citizens and adjacent communities from fire, infestations, drug crops and marauding wild animals? I hope not but ranchers, towns, private home owners and individual citizens deserve consideration in our country too. Some forms of silviculture, logging, and health maintenance can be conducted without building extensive roads, permanent roads, or banning chemical uses. Is an antibiotic bad if you have an infection in your body? Why then do we not treat our ailing forests? Balloons, helicopters, chemical spray, selective harvest, prescribed burning, basal treatments . . . there are many ways to 'manage' our roaded and unroaded or limited roaded forests with beneficial results to habitat, air and water quality, and long term value to our country. Local forest managers should know what is best for their area of responsibility, not congress. (Individual, Olympia, WA - #A26972.30100)

1425. Public Concern: The Forest Service should manage roadless areas no differently than the rest of the forest.

The Forest Service should protect the roadless areas in the same manner it protects ***all*** forest areas. Why should the roadless areas be any different? As far as protection from buildup of hazardous fuels, as these are roadless areas, why would there by any hazardous fuel buildup in the first place? (Individual, Monroe, GA - #A4875.30100)

Inventoried roadless areas should be subject to appropriate silviculture methods to protect from disease or insect infestation, as well as an active management program to reduce and control fuels that could feed wildfires. Ecosystem health should be a primary concern in the management of our national forests, and the best available tools to sustain forest health should be applied. Inventoried roadless areas should be subject to the same scientific management process as other areas of the forest. (Individual, Marietta, GA - #A4827.50100)

1426. Public Concern: The Forest Service should not designate areas as roadless if they cannot manage those areas to keep them healthy.

Inventoried roadless areas or any other management alternatives for public lands must allow stewardship activities like thinning and removal of hazardous fuel buildup. If roadless designation does not allow such management activities then the area should not be designated as roadless. Perhaps the best example

I can think of is the western white pine cover type. This cover type in northern Idaho and adjacent states has been reduced to about 5% of its original range due primarily to the introduction of the white pine blister rust disease. Science has produced a genetically improved blister rust-resistant tree stock. Foresters have the appropriate silvicultural techniques to ensure successful regeneration of this genetically improved stock. Much of the suitable site for this cover type is on national forest lands. Yet extensive recovery on public lands is in doubt because proper silvicultural techniques and access to these potential areas is denied due to roadless designations. For a complete analysis of this situation, I refer you to *Return of the Giants-Restoring White Pine Ecosystem* authored by a group of forestry professionals from USDA Research, Forest Service ecologists and silviculturalists and University of Idaho forestry professors. The simple truth is if you cannot manage the land to keep it healthy in a roadless designation, it should not be roadless. (Business, Colbert, WA - #A17500.30500)

1427. Public Concern: The Forest Service should determine federal management objectives achievable by a specific roadless area.

BY COLLABORATING WITH THE PUBLIC AND ADHERING TO FEDERAL DESIGNATION GOALS

Ecologically, a 'healthy' forest is subjective, in my opinion. My experience makes me believe that public land and national forest management is half sociology - you're always using the best available (but imperfect and statistically insignificant) information to work towards designated conservation goals, which are determined by the public. What's 'healthy' for nesting goshawks and spotted owls - lots of snags and blowdowns - may not produce the most timber. I believe that, realistically, this is a social more than a scientific question. I think that you should first decide federal management objectives achievable by a specific roadless forest tract - collaborating with the local community while ensuring adherence to federal designation goals. I think this process will free your ecologists to manage a forest that is 'healthy' by both local and federal definitions. Though this is kind of a complex idea, the idea is that ecologists can be freed to categorize such subjective definitions of 'healthy forests' as guiding assumptions and proceed with objective inquiry into that specified, constrained question, giving you more useful information. (Individual, New Haven, CT - #A706.30100)

1428. Public Concern: The Forest Service should recognize that the Roadless Area Conservation Rule does not preclude management actions to control insects, disease, and fire.

The RACR has adequate flexibility and allowance for a variety of management activities. These include road construction, thinning of forest stands, prescribed fire, etc. When the primary purpose is long term protection and maintenance of IRA. Decisions on why, where, when and how to apply these tools should be focused on long term maintenance of a relatively natural forest ecosystem. The RACR does not preclude employment of management actions to control insects and diseases which may occur in IRA, nor does it preclude fire/fuel management strategies within the National Fire Plan. (Individual, Lyons, OR - #A13491.30000)

Adequacy of Analysis

1429. Public Concern: The Forest Service should evaluate forest health.

BY INVENTORYING CURRENT FOREST HEALTH CONDITIONS AT THE LOCAL LEVEL

Forest health protection can best be addressed by inventorying the local current health conditions and allowing the local forester to determine the best management practices. (State Agency, Phoenix, AZ - #A17678.30100)

Forest health conditions should be inventoried at the local level so that management options can be assessed and the decisions made locally on how to address management including the use of timber removal and trail system construction to reduce wildfire risk. The resource protection methods applied in Washington and Oregon may not be suitable in the intermountain areas. Selection of "appropriate"

activities shouldn't be blanketly applied on the say so from Washington DC. (Individual, Bozeman, MT - #A19102.30100)

BY CONTINUOUSLY COLLECTING FOREST HEALTH DATA

Forest Health must be a main concern of all planning activities. Continuous data collection must occur to correctly identify any areas at risk of catastrophic wildfires, and insect and disease infestations. The forest managers as well as local communities and landowners must consider this information as the results will certainly cross boundaries and could possibly have devastating impacts on others. (Association, Kane, PA - #A6300.30100)

BY CONDUCTING A FORMAL, LOCALIZED RISK ASSESSMENT OF THE CONSEQUENCES OF PROHIBITING ACTIVE FOREST HEALTH MANAGEMENT

The flawed premise of the current roadless rule is that the prohibition of active land management will only create positive ecological consequences for our nation's policy. The fallacy of this premise lies in the overall success of our wildfire prevention policy. This 60-year-old policy has reduced the number of acres altered by wildfire nationally from 50 million acres a year to 5 million. The exclusion of fire from the ecosystem has created unnatural forests, choked with vegetation and dense undergrowth. The ecological result of these un-managed dense forests is disease, decay and potentially catastrophic wild fires that will destroy the very ecosystems that this initiative is trying to protect.

According to the Forest Service's Roadless DEIS, of the 54 million acres of inventoried roadless land in the country, 22 million acres are at moderate to high risk from catastrophic wildfire. A recent U.S. Government Accounting Office (1999) report states:

". . . a serious problem related to the health of national forests . . . is the overaccumulation of vegetation, which has caused an increasing number of large, intense, uncontrollable, and catastrophically destructive wildfires . . . . These fires not only compromise the forests' ability to provide timber, outdoors recreation, clean water, and other resources but they also pose increasingly grave risks to human health, safety, property, and infrastructure . . . ."

The members of AFRC believe that the Forest Service must conduct a formal, localized risk assessment of the consequences of prohibiting active management within these areas. This was not done in the last assessment of the roadless areas. What are the risks of wildfires and insect and disease infestation, on these and adjoining lands if no active management is undertaken? Each roadless area is unique. Forest types, stand conditions, values at risk, management objectives and the context of the area in relation to the surrounding lands are among the factors that must be considered. This argues strongly for the use of the forestland management planning process. (Association, Portland, OR - #A19004.30410)

Forest health is the most important management responsibility of the US Forest Service. Managing for Forest health includes disease prevention, reduction of catastrophic fires, stabilizing soils, wildlife enhancement, watershed and water supply improvement, and supporting rural communities. It is not known how the Roadless initiative will impact these key management responsibilities and activities. Analysis of these impacts of restricting management access to millions of acres must be comprehensive yet detailed, forest-by-forest and ranger district-by ranger district. This has not been done yet, and this initiative should be deferred until the next round of forest planning. (Elected Official, Reserve, NM - #A15538.30100)

BY COMPLETING AN INVENTORY OF ALL NATIONAL FOREST SYSTEM LANDS WITH FULL DISCLOSURE OF THE CONSEQUENCES OF VARIOUS MANAGEMENT STRATEGIES

Full resource inventory of all lands (multiple use, roadless, and wilderness) must [be] completed and then full disclosure of the consequences of various management strategies on the forest health. (Organization, Ketchikan, AK - #A23227.13212)

BY ANALYZING THE EFFECTS OF MANAGEMENT ACTIVITIES, THE NEED FOR TIMBER STAND IMPROVEMENT TREATMENTS, AND DEVELOPING A STRATEGY TO ADDRESS THE BACKLOG OF VEGETATION MANAGEMENT NEEDS

The Forest Service would benefit from having data that analyze the relationships between the probable causes of forest stress (such as fire suppression, intensive logging followed by a substantial lack of

precommercial thinning, etc.) and the probable effects of those stressors (such as increased stand densities; increased competition for space, light, water and nutrients; increased evapotranspiration; increased insect and disease outbreaks; and increased catastrophic fire conditions. We suggest identifying the consequences of an ever-widening gap between timber stand improvement needs (2,021,000 acres in FY 2000) and timber stand improvement treatments (224,000 acres in FY 2000) and how this contributes to the current conditions and trends with respect to insects, diseases and wildfire. We also suggest developing a strategy that addresses the back log of vegetation management needs on the lands that are not suitable for timber production, which may not be accounted for in the timber stand improvement program. (Federal Agency, Washington, DC - #A28843.30100)

1430. Public Concern: The Forest Service should use up-to-date science conservation and biology principles.

TO RESTORE ECOLOGICAL PROCESSES

The management of roadless areas for forest health should use up-to-date science conservation and biology principles to restore ecological processes. To keep a forest healthy is to keep it roadless. (Individual, Santa Cruz, CA - #A15357.30100)

1431. Public Concern: The Forest Service should protect roadless areas as a baseline to gauge the effects of management techniques on forest health in other areas.

Insect and disease issues are largely overstated for roadless areas. Naturally occurring insects will tend to cycle between high and low levels. The rule did not prevent management with all options outside of roadless areas. There is no evidence that roadless areas are any more prone to these problems. Indeed roads have helped move diseases into Port Orford Cedar. Roadless areas also provide badly needed control areas to gauge the effectiveness of management techniques on other lands. The need to control costs would suggest that we critically evaluate the effectiveness of various techniques. Without control areas free of manipulation, no scientific estimate of their validity can be made. (Organization, Missoula, MT - #A26424.31210)

Roadless areas provide a baseline for judging the impacts of more intense land-use activities on multiple use lands.

Because roadless areas in the Southern Rockies and elsewhere provide examples of ecologically healthy landscapes, they provide important opportunities to gauge the health of lands being managed primarily for resource extraction and more intense levels of use. Without roadless areas, there is no reliable ecological baseline to compare the relative health of our more intensely used lands. Thus, roadless areas are an invaluable tool for land and resource managers, helping to ensure the health of all our public lands. Providing this baseline, however, requires protecting a substantial amount of roadless lands in all ecosystem types found on the national forests, as a variety of ecosystem types occur across our national forests. (Organization, Denver, CO - #A21367.30100)

1432. Public Concern: The Forest Service should consider that our infrastructure programs, budgets, and knowledge of the best way to deal with forest health concerns are rudimentary.

Nationally, fuels buildup and forest health are vital concerns, but our infrastructure programs, budgets and even our knowledge of the best way to deal with them are still rudimentary. Luckily, aerial and satellite based remote sensing, together with on-ground sampling and truthing, provide a way to monitor roadless areas as well as roaded areas—better than simply by sampling from roads.

It is possible that "roadless" status is not an irrevocable classification for future generations, but for now roaded area acres are more than ample to strain all existing budgets manpower and equipment, and to try out a variety of treatment methods—to explore their costs and benefits and to compare results against the "control group" of unroaded acreage. It makes no sense to modify "roadless" designations now on the basis of these concerns, until these concerns are already adequately addressed on all roaded acreage.

Once the Forest Service has been given a more than adequate budget to deal with all areas, and once it has accumulated sufficient practical experience applying management methods and well understands their advantages and limitations, then it will be in a position to recommend any changes that should be made to roadless area management. That is knowledge we don't now have. (Individual, Spokane, WA - #A20648.30100)

1433. Public Concern: The Forest Service should define and publicize the forest health risks that will result from roadless designation.

TO ADJACENT PRIVATE AND STATE LANDS

All roadless areas should be managed under a local forest plan. Such plans can best provide for healthy forests while protecting adjoining lands from wildfires and the spread of disease. Areas designated as roadless pose a higher risk for disease and wildfire because roads are not available but are necessary for many management techniques required to ensure forest health. If the USFS determines that keeping an area roadless is worth the risk to adjacent private and State lands, then it must define and publicize the risks that will result. In the Chugach National Forest of Southcentral Alaska the USFS has failed miserably in controlling a major infestation of the spruce bark beetle, even though they had the authority to control the problem. If the roadless rule had been in place it would have been totally impossible. Today these areas, as well as adjacent state and private lands are at tremendous risk to wildfire. (Association, Anchorage, AK - #A23255.30600)

1434. Public Concern: The Forest Service should provide scientific data to support the claim that a national roadless rule will have a positive effect on fire and insect management.

The proposed rulemaking and policy indicates a belief that its adoption would have a positive effect on fire and forest pest management, but offers no scientific data to support this determination. Without a road system to support ecosystem management, timber harvesting to create wildlife habitat, salvage logging of dead and dying timber to remove fuel loading, sanitation harvesting to control insect and disease epidemics, thinning to achieve the desired number of trees, and reforestation projects all become largely uneconomic. Forest health will continue to decline in non-roaded areas without management, and fuel buildups will increase without mechanical removal of the material. It is time to group Forest Service priorities: the National Fire Plan addresses some of these same topics proactively while the Roadless Area Conservation proposal effectively ignores the need for management where conflagrations are likely. (Professional Society, Anchorage, AK - #A21707.30100)

1435. Public Concern: The Forest Service should provide empirical studies to support the claim that thinning small-diameter trees will restore ecological processes, provide habitat for endangered species, and avert catastrophic wildfire.

BECAUSE OTHERWISE, LOCAL EMPLOYEES MAY EXPLOIT AREAS IN THE NAME OF FOREST HEALTH

While the rule also gives local forest managers discretion, on a site-specific basis, to thin small-diameter trees where needed to restore ecological processes, provide habitat for endangered species, and avert catastrophic wildfire—we know of no empirical studies that prove this works. Allowing this discretion is a loophole that some Rangers are already exploiting in the name of "forest health."

The best way to maintain healthy roadless areas is to keep them roadless. According to the Forest Service, less than 2% of the inventoried roadless areas are at combined risk of insects, disease, and fire. Wildfires are much more likely to start in areas with roads, due to increased public access. The Forest Service has successfully controlled 98% of wildfires in inventoried roadless areas without building roads into these pristine forests. (Business, Spokane, WA - #A22047.30100)

1436. Public Concern: The Forest Service should bring together a bi-partisan group to discuss forest management tools and to make science-based recommendations.

FOR FOREST HEALTH

At the recent Governors' Conference, the pact for massive thinning promulgated by the Dept. of Interior and Dept. of Agriculture is cause for grave concern. How will this thinning be done? By helicopter? If not, how many miles of new logging roads will be required?

Whether or not, lightning will strike and forests will burn.

If all the underbrush is removed, what happens to the many creatures and plants, including endangered species, whose habitat is destroyed?

Before embarking on a costly and potentially destructive program, wouldn't it make sense to bring together a bi-partisan group of knowledgeable persons to discuss what works best and what works less well and to make science-based recommendations? This Forest Service planning process is reportedly done for the next 10 years. Why is a policy not considered to maintain healthy, sustainable forests for the next 50-100 years? (Individual, Berkeley, CA - #A5762.30100)

1437. Public Concern: The Forest Service should allow staff scientists to make recommendations about forest health and other situations, and then allow the general public to comment on those recommendations.

The Forest Service has many outstanding scientists on staff whose job should be to make such recommendations as these forest health and others as situations arise. The general public can then comment on these recommendations. (Individual, Grayson, KY - #A16450.30100)

Adequacy of Analysis – Concepts

1438. Public Concern: The Forest Service should define "healthy."

AS THE MEANING MAY VARY ACCORDING TO AN INDUSTRIAL OR AN ECOLOGICAL PERSPECTIVE

"Healthy" is a subjective term. A tree farm may be "healthy" from the view of lumber production, but not by environmental measures. With one exception [Footnote 1: White pine blister rust was introduced by the timber industry from seedlings grown in Europe in the 1920s.] the insects and diseases of Northern Rocky Mountain forests are indigenous. Their abundance waxes and wanes with climatic or stand conditions. For example, bark beetles attack trees such as lodgepole when tree diameter exceeds eight inches, and may become widespread in older even-aged stands, especially following drought or widespread blow down. This is a natural event. Is it unhealthy? Little can be done to prevent it except to remove (i.e., log) the susceptible trees. Is this the answer you are seeking? Beetle killed trees may form large areas of "standing dead", highly fire susceptible trees. In the natural course of events, e.g., Yellowstone in 1988, forest fires occur and following that a new stand regenerates, relatively immune from beetle attack for the next half century or more. Is this unhealthy? (Individual, Lolo, MT - #A111.31200)

First, we must define a healthy forest. Healthy according to whom? The author's definition of a healthy forest is one with reduced fires, reduced fuels, reduced insect attacks and reduced disease attacks. This is so incorrect ecologically. Fires (even severe ones), insects and diseases are all natural elements that the forest and its animals, birds, fish inhabitants have evolved with and need.

The only reason for reducing severe fire, insects and disease is to increase the value of trees that would be milled into boards. This may be quite important on industry owned lands, but must not be a prime motivator on National Forest managed lands. (Individual, Grangeville, ID - #A830.30130)

This is the old forest service speaking, the agency which has had to swallow bitter pills in courts of law due to outmoded science and thinking. We need serious discussion on how to define a "healthy forest".

Many of us would opt for throwing out the term completely and replace it with ecological integrity. My particular efforts are to bring people together around the principles of conservation biology which addresses "forest health" through issues related to biodiversity. Landscape ecology is also an excellent new way of looking at forest management and a forest in Oregon has done some pioneer work. (Association, No Address - #A8392.30100)

AS THE MEANING MAY VARY ACCORDING TO MANAGEMENT OBJECTIVES ON EACH SITE

Forest "health" is an enigmatic and meaningless term; the definition varies according to management objectives on each site. Whatever it may mean, we do not need roads to conserve diverse forests that support wildlife and other values. (Individual, West Glacier, MT - #A5946.30000)

Your question on "healthy forests", implies that fire, insects and diseases are undesired or rare elements in a forest ecosystem. These things occur everywhere on the forest, not just in roadless areas. The use of the term "healthy forest" is an unscientific term which has been concocted to exploit a political end - the commercial logging of public forests. Natural processes are not unhealthy when viewed over the long term. The F.S. should concentrate on preserving roadless areas as naturally functioning ecosystems and concentrate on the remainder of the forest for experiments on managing forests. (Individual, Great Falls, MT - #A13329.30000)

How can forest health be a factor when the standards by which forest health is gauged is not agreed upon? Biologists; opinions on what constitutes a healthy forest vary; when credentials are comparable and recommendations differ, how can the decision-making individuals at the Forest Service decide who is correct? The idea of forest fires and bug infestations as indicative of an unhealthy forest is illogical and unproven, and rather should be seen as a necessary and inevitable part of nature. Look to history: our western forests have existed and thrived for thousands of years without Forest Service "management" and should be left to continue to do so. In hindsight, most "management' of ecosystems result in disaster and cost taxpayer dollars to fix. In Montana, planted lake trout destroyed the salmon fisheries, which in turn eliminated a main food source for bald eagles -- we now plant thousands of salmon fry a year to try and repopulate fisheries; channeled streams and rivers have resulted in severe flooding—we now are returning some to their original flow in order to combat flooding; logging in steep federal-forested drainages has resulted in silt contaminating the streams in which bull trout reside, facilitating their endangered status—we are still fighting on how best to boost the fish population; roads constructed on federal land in grizzly habitat has resulted in human and motorized vehicle access which directly contributed to the deaths of several grizzlies within the last year which will keep them on the endangered list even longer. My point is that every time humans go in and "manage" something, it produces eventual negative consequences which ultimately need to be fixed with lots of tax dollars. The time is long overdue for a hands-off management policy. Leave them alone and the forests will thrive as they always have. (Individual, Kalispell, MT - #A26974.30100)

1439. Public Concern: The Forest Service should go beyond the traditional concept of "healthy forests" to embrace the concept of healthy ecosystems and natural processes.

We had hoped that the Forest Service had gotten beyond the traditional concept of "healthy forests" to embrace the concept of *healthy ecosystems* and *natural processes*. After all, you are not managing a tree farm but an incredibly complex system which may be better left to its own destiny. At any rate, it can be shown by the agency's own research that roadless areas have more biological diversity and a wider range of habitats than roaded areas, and thus may be deemed *healthier* than Forest Service lands with roads. Roads don't help much with anything but the management of *trees*, and makes the management of motorized recreation all the more difficult, if not impossible. (Organization, Vernal, UT - #A29144.30100)

1440. Public Concern: The Forest Service should measure forest health in terms of clean water, biodiversity, and solitude.

The forest health and wildfire arguments raised by the timber industry are red herrings. The forest fires in the western United States have burned predominately in roaded and logged areas and "forest health" should be measured by more than just the board feet a given acre can produce. Measured in terms of clean water, biodiversity and solitude, our roadless areas are the healthiest forests remaining. (Organization, Bozeman, MT - #A20515.30100)

1441. Public Concern: The Forest Service should define temporary and short-term treatments.

A variety of methods and techniques will be needed and some or all may or may not be allowed in them depending on the management goals and objectives. Thus some IRAs may allow some road and trail construction to facilitate management treatments for temporary or short-term projects. Definitions of temporary or short-term should be included, such as 18 months for temporary and 5 for short-term. These options will allow for treatments that treat fuel build-up, insect and or disease problems or potential problems. There should be a standard that these words would not be open for general public use during the life of their use. (Individual, Missoula, MT - #A28297.30120)

1442. Public Concern: The Forest Service should acknowledge the concept of natural disturbance regimes.

Wildfires, insects and disease are natural mechanisms that act across landscape scales to sustain a healthy mix of forest successional stages fostering high biodiversity and providing a variety of important habitats for the forest's many plants and animals. The build-up of "hazardous fuels" mentioned in the question is a simplistic description of the manifestation of decades of fire suppression. It is not a wide-spread phenomenon in natural forest ecosystems but a symptom of expanding human settlement into forested landscapes. It annoys me to think that professional foresters employed by the federal government do not acknowledge the concept of natural disturbance regimes, a concept taught in any high school biology class. (Individual, No Address - #A27789.30100)

A very critical aspect that in the past has not been considered in doing this analysis is the temporal variation that occurs in ecosystems. Therefore the conditions now AND in the future, need to be put in the context of the disturbance regimes that are associated with the ecosystems being managed. (Individual, Missoula, MT - #A28297.30110)

Funding

1443. Public Concern: The Forest Service should consider that policy changes, and attendant litigation, have cost a great deal of money that could have gone to forest health treatments.

The issue of Forest Management has been controversial for years. The present changes in the 'Management Planning Regulations', the 'Road Management Policy', and this 'Roadless Area Conservation Rule' have been initiated by emotions, with political pressure, and have not been based on scientific data. I would be very interested to know how many areas that burned in 2000 and 2001 had litigation that prevented or delayed needed treatments designed to promote forest health. The extensive loss of natural resources in these burn areas will manifest themselves far into the future. The money spent on litigation, in the last 10 years alone, could have been put to a greater use with management activities on the ground. The error ridden Roadless Conservation Rule cost $9.4 million to compile. The money could have provided much needed fuel load reductions and prevented much of the devastation by the last 2 years of catastrophic wildfires. (Individual, Centerfield, UT - #A30440.20000)

1444. Public Concern: The Forest Service should hold litigants responsible for the damages caused by their lawsuits that prevent forest health treatment or management activities.

BECAUSE MANAGEMENT OF NATIONAL FORESTS WILL CONTINUE TO BE STIFLED, FURTHER EXACERBATING FOREST HEALTH

I would like to see litigants be held responsible for damages caused by their lawsuits preventing treatment/management activities aimed at restoring forest health, controlling insect and disease outbreaks, and the destruction of watersheds. Until litigants are held accountable for the misrepresentation of facts, management of our National Forests will continue to be stifled, which further exacerbates the declining health of our National Forests. (Individual, Centerfield, UT - #A30440.30100)

Active Management

1445. Public Concern: The Forest Service should actively manage natural resources in roadless areas.

BY EVALUATING PRACTICES IN OTHER STATES

View every state and see what they are doing and what is working and what is not. Again, South Carolina seems to have a good plan in place. Evaluate our practices and see if they will work in other areas. Keep in mind that the local forest planners may have ideas that work in their areas. Actively managing our forest with prescribed burns, thinning or cutting should eliminate most problems if done in a timely, thought-out manner. (Individual, No Address - #A57.30000)

BY USING INFORMATION FROM ITS EXTENSIVE DATABASE ON WILDFIRE AND INSECT RISK AND ELEMENTS FROM THE NATIONAL FIRE PLAN

The Forest Service currently has an extensive database on the risk of wildfire and insects infestations on national forest lands. Local forest planning processes should utilize this information and the elements of the National Fire Plan to increase activities that will protect forests from severe wildfires. These lands should be actively managed and full range of options including mechanical treatment and timber removal to protect and maintain desired conditions. (Association, Boise, ID - #A17232.30500)

BY CONSIDERING THE SITE-SPECIFIC CHARACTERISTICS OF EACH FORESTED AREA

The management of Roadless or any other areas of the National Forests to provide for "healthy forests" depends on the characteristics of the specific forest area under consideration. An old growth Douglas fir stand that is considered prime habitat for the northern spotted owl and other old growth dependent wildlife species contains large quantities of dead, dying and "defective" trees but is healthy. In contrast a 20-30 year old Douglas fir stand that is being managed for timber production may be considered "unhealthy" if it is overstocked or infested with insects that will in time result in the death of some of the trees which will become fuel for wildfires or breeding sites for woodpeckers. (Individual, Olympia, WA - #A278.30100)

Protecting forests: Management of inventoried roadless areas to provide for healthy forests should vary depending on the type of forest. For example, in forest systems characterized by frequent low intensity fires (e.g., Ponderosa pine forests throughout the West, Sequoia forests of California's Sierra Nevada), thinning of small (<10 inch dbh) trees and brush removal should be conducted to prevent catastrophic high intensity fires that result in extensive mortality of large (> 12 inch dbh) trees. Such activity will also prevent the spread of many insects that can kill mature trees and increase the danger of catastrophic fires in systems whose species are not adapted to them. Thinning activities should be conducted first in the urban interface zone, but later in more remote areas. Rather than construct roads to access remote areas, crews should land by air or travel by foot and leave cut trees in place, in piles, for controlled burns. I have observed such management on the White Mountain Apache Reservation within Arizona, perhaps the best management of ponderosa pine forests that I have ever seen. (Individual, Davis, CA - #A30523.30531)

It depends on the forest and where it is. It is not realistic to manage a lodgepole forest in Montana in the same manner as a redwood forest in California. As for the forests in Montana, the dead and dying trees should be removed and used. The waste should be chipped. Fires are unacceptable as they are too dangerous and cause too much air and water pollution. This pollution detracts from our local and statewide tourist industry. (Individual, Columbia Falls, MT - #A29651.30100)

There is no "one" answer as to how IRA's should be managed, since every roadless area is a distinct and unique unit. The diversity of factors that must be addressed in managing roadless areas is profound. Forest types, stand conditions, values at risk, management objectives and the context of the area in relation to the surrounding lands are among the factors that must be considered. Consequently, each IRA should be managed individually.

Since the agency must preserve the IRA in the condition it was as of the date of the designation as a Roadless Area, any activities that significantly alter the condition of the IRA at the time of designations are prohibited. The agency should conduct forest health projects, including but not limited to timber harvest, in order to preserve the condition of the area at the time of designation.

It is unwise for the agency to let national initiative eliminate effective tools for preserving the conditions of IRA's as well as managing other areas of the forest. (Organization, Lakeside, CA - #A29963.30100)

BY ACTIVELY MANAGING TO CONTROL INSECTS, DISEASE, AND FIRE

We of the western states have long realized that to do nothing is not an acceptable approach to keeping a forest healthy. As I see new fires starting up in the yearly fire season I can't help but wonder why someone would so passionately fight for a forest then to tie the hands of the people that are trying to ensure its health. We have a park here that was privately donated near Tensed, Idaho that is being hit by the tussock moth the state has tried to control them with pesticides but now we are aggressively but responsibly logging the diseased trees to prevent a major fire that would consume the entire park and possibly a couple of towns. (Individual, Saint Maries, ID - #A1727.30100)

How on earth can the Forest Service ever consider that by letting a forest go by the wayside in favor of not managing timber harvest, if for no other reason eliminating decadent timber stands which create fire hazards, fail to manage a beetle outbreak on a community watershed, etc., as protecting communities, homes and property? This in favor of creating a de facto wilderness called a roadless area. As forest professionals, you know and we know, that this practice of designating large roadless areas is not in the best interest of managing for improved watersheds, lowering fire danger, and in general providing for good forest health. (Elected Official, Monticello, UT - #A4890.10112)

It must be decided how each roadless unit is to be managed in the long run. Units proposed for wilderness will have an entirely different set of constraints than those to be managed for multiple uses and roaded. Maintaining the health of surrounding forest lands and protection of private property is paramount. Harvest of forest products for fuel reduction and forest health is an option in many cases. Modern equipment can often remove high-risk material without roads. Few roads are needed to accommodate harvest today. Also, managing roadless areas to retain their roadless character does not preclude the use of managed fire or application of chemicals for insect control. (Individual, Lewiston, ID - #A2872.30100)

I am writing to say we need to change the Roadless Area Conservation Rules. If we do not revise the Roadless Policy, it will have a very negative affect on Lake County and the rest of Northern Minnesota. Some of the reasons are:

1. The amount of forest managed for forest health has decreased by close to 50 percent over the last few years. The rules will increase the negative affect of no management.

2. Lake County's land base is currently about 58 percent federally owned, and about one million acres of our area is in the BWCAW. We also have a huge amount of specially classified area spread across Northeast Minnesota.

3. In the July 4th storm a couple of years ago, 400,000 acres of forest blew down. Because of the lack of forest management, the loss was greater than it needed to be. (Elected Official, Two Harbors, MN - #A18049.30100)

Native Americans treated, predominately with fire, the country they habituated. There were prairie fires, meadow grass fires as they left the high country in the fall of the year, thinning of the forests by fire for better hunting practices and to regenerate forage for the upcoming season. Fire cycles and fire intensity are escalating under contemporary conditions which have eliminated the cycles that most of our North American landscapes have evolved with. Circumstances require more human involvement, not less. The history and study of natural resources management reveal that the greater task in settling "management" issues is to resolve the political side of the equation. Start with communities and build an ecologically sound vision that can be supported. Start from the ground up. (Individual, Elko, NV - #A23651.30400)

BY TAKING SPECIFIC AREAS OUT OF ROADLESS DESIGNATION TO MINIMIZE INSECTS, DISEASE, AND FIRE

Protecting Forests - How should inventoried roadless areas be managed to provide for healthy forests, including protection from severe wildfires and the buildup of hazardous fuels as well as to provide for the detection and prevention of insect and disease outbreaks?

You must already know this but you cannot have both roadless areas and healthy forests. It is just not possible. The only logical and sane response to this question is that you, the USFS, identify those areas of the forest that are worth managing for the future and take them out of the roadless category. Then you can perform the necessary sanitation logging and pre-disaster thinning that most of these stands so desperately need in order to minimize the impacts of insect, disease and wildfire. (Individual, Montrose, CO - #A370.30100)

BY ALLOWING THE RESPONSIBLE HARVEST OF TREES AND WILDLIFE

I believe that the Clinton-Gore roadless plan is basically flawed. In denying public access to wildlife areas and areas of forestation, it has already resulted in rampant wildfires in the western U.S. as well as booms in certain populations of wildlife that has resulted in diseases and starvation due to overpopulations.

I believe that responsible harvesting of wildlife and logging, results in a healthier wildlife population and less likelihood of diseased and weak trees due to competition with underbrush. Even the news media in the western parts of the U.S. are questioning the wisdom of the roadless plan. (Individual, No Address - #A6805.30100)

BY CLEANING UP WOODY DEBRIS

We are truly insulted by the lack of resolve the Forest Service has in fighting for their right and job to husband and nurture our forest in the manner that they deserve. We get daily reminders of how to protect our houses and ranches from wildfires by picking up excess debris scattered about or left laying by the buildings and other "safety habits" but the Forest Service is letting itself be forced into "a do nothing" and "let it burn" attitude by a bunch of idiots who don't give a rip about anything but their own outlook . . . most of these people have not a clue of "reality". For centuries animals have used caves for nests and dens . . . why in the world would you have to leave a bunch of dry debris all about for the same purpose? We also have so many imported bugs and viruses now established by our country's quest for "more goods" that any "native" ones from 100 years ago . . . for gosh sakes, anyone with a lick of sense would know that trash breeds bacteria and if you don't "clean your house" you are inviting bugs, virus, and bacteria. (Individual, Mazama, WA - #A757.30100)

BY RELYING ON ACCESS OTHER THAN ROADS

No additional roads should be built. Wildfires should be strongly suppressed. Controlled burns should be encouraged. If mandated by threat of disease some selective helicopter logging should be allowed as long as the sale pays for itself in full. (Individual, Kalispell, MT - #A97.30100)

These protected forests could be managed by hand thinning, understory burning or helicopter thinning/logging, but NO roads. (Individual, No Address - #A101.30100)

The issue of Forest Protection is the same whether the forest is roadless or not. There are ways to deal with roadless areas. How are they being handled now? Disease can be treated in various ways, such as from the air or over land. Wildfire protection is somewhat overblown. Treat the fringes of the roadless areas by thinning, therefore rendering wildfire problems less of a hazard. Building roads will not reduce the possibility of wildfire. Roads make for easy access for the public and make the possibility of wildfire greater. (Individual, Coulterville, IL - #A114.30000)

Roadless areas should remain so. In general, they are roadless now because building roads and harvesting timber has not made and does not make economic and environmental sense. If forest managers determine that fuel reduction or remediation of insect infestation is truly necessary, then aerial extraction should be used rather than building roads. (Individual, Bozeman, MT - #A1134.30200)

Some fuel reduction around developments and prescribed burning other areas are acceptable management strategies in roadless areas as long as NO ROADS ARE CONSTRUCTED. (Individual, Ennis, MT - #A2249.30100)

BY WORKING WITH STATE AND LOCAL GOVERNMENTS TO ACTIVELY IMPROVE FORESTS AND RANGELANDS

Roadless area supporters argue that the best way to maintain healthy roadless areas is to keep them roadless. This may be the case for the temperate forests; however, in the arid west accelerating drought conditions combined with an explosion of invasive weeds, insect damage, and catastrophic wildland fires have created a potentially devastating environment. We feel strongly that a blanket ban on road building in inventoried roadless areas will undermine ongoing efforts to reduce fuels, implement site-specific fire suppression, control weeds, and monitor forest/rangeland health. The most likely outcome of such a ban is continued long-term resource deterioration punctuated by catastrophic and perhaps irreparable damage by fire, erosion and weed infestation. Land management agencies must be mandated to work with state and local governments to actively improve our forests and rangelands even if the improvements require access into inventoried roadless areas. (Elected Official, Eureka County, NV - #A20741.30100)

BECAUSE UNMANAGED LANDS AND WILDLIFE WILL SUFFER

It has been proven time and again that lands and wildlife left to, supposedly, their own will not prosper but will suffer. Whether we like it or not, the mere fact that we are living on this planet affects all life. As such it is impossible for that life to just be left totally alone. (Individual, Speedway, IN - #A3928.30000)

1446. Public Concern: The Forest Service should allow helicopters in roadless areas.

TO HARVEST DEAD TREES AND FUELS OR TO PILE AND BURN

In true roadless areas, use helicopters to remove dead trees/fuels, or pile and burn seasonally during the winter. Most private property owners do. (Individual, Prairie City, OR - #A15474.30550)

Ecosystem/Restoration Management

1447. Public Concern: The Forest Service should utilize best management practices.

TO REDUCE THE RISK OF CATASTROPHIC EVENTS

Agencies must utilize best management practices to reduce the risk of catastrophic events. The Agencies should never start fires on windy days, and vertically mulch routes as part of fire restoration projects! (Individual, Santa Ysabel, CA - #A26392.30100)

1448. Public Concern: The Forest Service should restore forest health.

The first consideration of inventoried roadless areas must be the need to restore forest health. Rules governing management of roadless areas must permit restoration. Following restoration, rules governing management must consider realistic methods essential to the long-term protection of the roadless areas. Roadless areas must be distinguished from wilderness areas and must provide the broadest methods appropriate for forest health protection, including timber removal. (Association, Sacramento, CA - #A22614.30100)

1449. Public Concern: The Forest Service should recognize that forest health does not require the destruction of old growth vegetation.

The roadless rule will help protect older forest structural stages on a national level. In my experience, rarely does ecosystem health actually mandate the consumption of the oldest structural stages of vegetation. That type of consumption, in my region, is conducted more for economic and political reasons than ecosystem health, in my opinion. Some analysis using varying scales can portray forest stands that have high percentages of mature structural stages in certain watersheds. However, if the values of those forests that are lost are looked at in a national scope overall, there is still a large deficit in older forest structural stages. (Individual, Penrose, CO - #A21448.60120)

1450. Public Concern: The Forest Service should use conditions that existed just prior to Euro-American contact as a baseline for management.

TO AVOID UNFORESEEN AND NEGATIVE CONSEQUENCES

Certainly Native Americans "managed" ecosystems to some extent too. It is also true that ecosystems are dynamic, making establishment of "baseline ecosystem conditions" somewhat arbitrary. Nevertheless, the need for establishing baseline conditions that existed prior to intensive, mechanized, large-scale forest management is indisputable - ecosystems are simply too complex for us to ever intensively "manage" over large areas and timescales without unforeseen and often negative consequences. The best we can hope for is to tinker intelligently, at relatively small scales, guided by ecosystems' range of natural variability rather than the "nature as machine to serve humans" metaphor. This requires some knowledge of what that range of variability is, and establishing some kind of baseline reference conditions. Conditions that existed just prior to Euro-American contact are as good as any to serve as this baseline, and are the most likely to be discernable by scientists. (Individual, Corvallis, OR - #A650.30110)

1451. Public Concern: The Forest Service should consider that permitting states and local jurisdictions to develop lands adjacent to national forests interferes with natural forest health processes.

Natural processes should determine the health of forests in roadless areas. In the long run, nature itself has proven to be the best manager. It is when man tampers with the natural process of destruction and rejuvenation that causes the greatest problems in forest management. For example, permitting states and local jurisdictions to develop lands adjacent to national forests interferes with these natural processes. In the end, the Forest Service spends large sums of taxpayer dollars to fight fires that should burn naturally and insect and disease outbreaks, which are many times imported by adjacent developments. (Individual, No Address - #A9085.30100)

1452. Public Concern: The Forest Service should replant burned or cut timber areas.

We must protect our natural forest resources here in Oregon. I feel bad every time there is a forest fire! There needs to be replanting of burned or cut timber areas. (Individual, Turner, OR - #A14537.31100)

1453. Public Concern: The Forest Service should find a variety of low-resource using, non-polluting alternatives to road-based management practices.

I'm sure there are a variety of low-resource using, non-polluting alternatives to road-based management practices. Electric battery-powered lightweight ATVs strike me as one possibility. These, in conjunction with a series of micro-footprint observation stations, satellite monitoring, and other techniques, should enable you to maintain sound management practices. Try some Yankee ingenuity. (Individual, Chestertown, MD - #A462.30400)

Ecosystem/Restoration Management – Roadless Areas

1454. Public Concern: The Forest Service should protect roadless areas.

BECAUSE ONCE AREAS ARE ROADED, THEY ARE EXTREMELY DIFFICULT TO RESTORE

Roadless areas must remain roadless! It is extremely hard to restore lands to their preroaded condition. I have an MS in forestry and I never had such an idea proposed to me in any of the forestry classes I have taken. We simply do not know how to practice restoration so completely and the problems caused by roading are extremely difficult to deal with. For proof of this just look at the spread of exotic plant species along roadsides and the millions of dollars we are spending nationally to combat this issue. (Individual, Sandpoint, ID - #A28585.30110)

1455. Public Concern: The Forest Service should not actively manage natural resources in roadless areas.

ALLOW NATURAL ECOSYSTEM PROCESSES TO OPERATE

Inventoried roadless areas should be left alone. There is no need to "manage" natural forests. If there is a fire, let it burn. Let the forest deal on their own with insects and diseases. The forest managed on their own for millions of years without the assistance of the Forest Service, and there is no reason to think that evolutionary defenses are anything but the most appropriate for our national forests today. (Individual, New Haven, CT - #A616.30000)

We all know the forest health issue is overblown by the timber industry and some Forest Service employees. Even in areas where fuels are at higher levels than average and fires are imminent, I would much rather see the forests burn (even hot, stand replacing burns) than see them roaded and logged. Nature has learned to evolve with and actually depend on natural events such as fire and insects. Nature simply does not handle the constant press disturbances associated with roading, logging and mining.

Not all trees are, or should be healthy. A healthy population of anything depends on some sick and dying individuals. Dead trees make new dirt and are excellent habitat for some birds. Most dead trees do not belong in the mill. (Individual, Grangeville, ID - #A830.30000)

Roadless forest areas should be managed as natural areas and with natural processes permitted to shape the forest. Naturally caused fires should be permitted to burn and only man-caused fires should be considered for human intervention. The same applies to disease. Fire and disease are natural processes. The problem right now, it seems to me, is that we insist on viewing the state of any particular forest in terms of short-term periods (as in our lifetimes) instead of dynamic systems that shape themselves over hundreds and thousands of years. Put another way, what happens to a forest, or how it looks during the next ten years is not important. What is important is what it will look like in a hundred years, or five hundred years. (Individual, Billings, MT - #A277.30100)

Forests managed to do just fine for millions of years without human intervention. Humans entered the Americas only some 15,000 years ago, the blink of an eye in evolutionary terms. The notion that forests now require human cosseting with chainsaws and bulldozers is absurd, and true only to the extent that remediation of the effects of abusive human activities (logging, grazing, mining, road building) and

excessive fire suppression is necessary. Thus, cessation of the activities just mentioned, closure and obliteration of cherry stem roads, stream and stream bank restoration, use of prescribed fire and mechanical thinning of dense, fire-prone reproduction (not mature, fire resistant trees) created by logging or overzealous fire suppression, eradication of invasive exotic species, and any other measures which may be useful in keeping roadless areas in a natural state, or returning them to that state, all should be funded and initiated fully and immediately. (Individual, Dallas, OR - #A3697.90110)

Question #A 3: All roadless areas should be managed to retain their natural ecosystem characteristics and processes to protect their potential to be included in the Wilderness Area system of the National Forest. Therefore, we feel that wildfires should be allowed to burn and insect and disease outbreaks should be allowed to run their course. Healthy forests, as defined by us, include all of these native disturbance components which contribute diversity to a native forest. (Individual, Nine Mile Falls, WA - #A15241.30100)

This question displays an alarming lack of comprehension of even the most basic principles of forest ecosystems and an absolute failure to understand the underlying rationale for the roadless rule. Roadless areas need no management at all! The whole reason we are trying to protect roadless areas is to allow those areas to behave in a natural way. Periodic fires are natural. Without any management at all, these areas will quickly revert to a natural cycle of burn and rebirth. The excessive underbrush that is the result of past management practices will disappear and the severe crown fires that many areas now experience will diminish rapidly. Insect and disease outbreaks are also natural. The severity of these outbreaks is also a result of forest management practices. The natural environment contains predators that keep disease/pest populations in check. The term management, in this instance, is another excuse to allow extractive industries to thwart the will of the people. No management of these areas is required. (Individual, Denver, CO - #A12861.30000)

REMOVE BARRIERS TO NATURAL PROCESSES

Most forests that are unhealthy have become that way because of the arrogance of the US Forest Service. Fire suppression has caused some buildup of hazardous fuels, but grazing and the introduction of non-native species have also increased problems with the health of our forests. Roadless areas should be managed to allow natural processes to dominate the landscape, allowing these to determine what a "healthy forest" is. The Forest Service can remove barriers to natural process by:

1) Removing cattle from roadless areas

2) Prohibit the use of motorized vehicles in roadless areas

3) Monitoring and removing non-native invasive species (native pets are OK)

4) Stop suppressing fires unless they imminently threaten adjacent private property. (Individual, Takoma Park, MD - #A16325.30100)

BECAUSE OF THE LACK OF FUNDING

Our forests are stressed from past management practices, logging, road building, weed introductions, pest distributions, fragmentation, genetic isolation. We don't have enough federal funding to "take care of every tree", so it is imperative that we limit the amount of contact we have with the forests. When there was more acreage of forest lands [we] could afford to lose parts to fire and pests and still have "adequate margins of safety" regarding their health. (Individual, No Address - #A17946.30100)

1456. Public Concern: The Forest Service should restore roadless areas damaged by past management practices.

BY ALLOWING NATURAL PROCESSES TO OPERATE

Wild forests do not need to be managed, except to overcome the damage that past "management" has caused. This means that we should consider the option of removing brush undergrowth, but then should allow wildfires to occur when naturally caused. (Individual, Norwalk, CT - #A884.30100)

The whole point of a Roadless Area is maintaining the natural status quo. Therefore, natural forces should be allowed to work in these areas, if there is no immediate danger to human life or property. Fires, insects, and diseases are natural forces, unless human-induced. If these agents are human-induced, a careful but speedy evaluation of the pros and cons of preventative management should occur prior to action. (Individual, Astoria, OR - #A476.30000)

Very few roadless areas have been logged or otherwise intensively "managed". Many are high altitude and not particularly fire prone. Moreover, fire is an important component of many forest ecosystems and fire suppression has caused more problems than it has solved — witness the dangerously high fuel levels in many "managed" areas, and the fires of the past couple of years in the intermountain west. The USFS has many years of work ahead of it just to get fuel levels in areas that already contain roads back within their natural range of variability. There is also much work to be done to restore some semblance of variability in stand structure and species composition in even aged, single species second and third growth areas. The USFS should concentrate on these areas, rather than promote disingenuous arguments that roadless areas need to be actively "managed".

Any exceptions to these general conclusions can be handled on a case by case basis, under the NEPA EIS process, with careful review from ecologists who are allowed to conduct their work without political pressure from extractive interests. (Individual, Corvallis, OR - #A650.30310)

TO IMPROVE FOREST HEALTH

Again I would agree with the Roadless Plan which provides for road construction or reconstruction as needed to protect public health and safety. The Plan also allows access for thinning to reduce wildfire risk or restore the ecosystem. Building a road does not solve fire, insect or disease outbreaks. In fact building roads into roadless areas actually increases fire risk as well as the transport of noxious weeds and pests. In addition, previous logging practices of removing large old growth trees and clearcutting has resulted in forests which are more susceptible to severe wildfire and insect and disease damage. Restoration activities should be undertaken to improve forest health. (Individual, Ethel, WA - #A11767.30100)

1457. Public Concern: The Forest Service should close loopholes in the Roadless Area Conservation Rule for stewardship logging and fire suppression.

You must keep the roadless policy, as signed in January 2001. In fact, if anything, you should be making this policy stronger, closing loopholes created for stewardship logging and bogus fire suppression activities. (Individual, Seattle, WA - #A84.10150)

Suffice it to say: the Roadless Initiative, should be accepted—as over a million people have already clearly stated—with the full 58.5 million acres of roadless lands protected from logging and mining. Regarding our roadless national forest lands: NO NEW ROADS SHOULD BE BUILT PERIOD! Is that clear? If not, let me repeat it: NO NEW ROADS SHOULD BE BUILT, PERIOD! This is for Bosworth. NO NEW ROADS SHOULD BE BUILT PERIOD! This is for Veneman. NO NEW ROADS SHOULD BE BUILT PERIOD! This is for Norton. NO NEW ROADS SHOULD BE BUILT PERIOD! This is for Bush and Cheney. NO NEW ROADS SHOULD BE BUILT PERIOD! NOW, IS THAT CLEAR? I hope my words do not "seem rushed," nor appear ambiguous in any way. I want to be very clear on this. MR. BOSWORTH: I DO NOT WANT TO SEE ANY MORE ROADS BUILT ON FEDERAL ROADLESS LANDS, PERIOD! NO NEW ROADS, PERIOD, FOR ANY REASON, INCLUDING FIRES, LOGGING, AND MINING. NO NEW ROADS, PERIOD. NO NEW ROADS, PERIOD. Is this getting through? Do you understand this time? (Individual, Libby, MT - #A8346.10150)

I am begging you to protect all our national forest roadless areas from commercial logging, road building and mining. I respectfully request that no exceptions or exclusions be created to undermine or weaken the Roadless Area Conservation Rule. (Individual, Hereford, AZ - #A8776.10150)

1458. Public Concern: The Forest Service should consider that human activities cause more damage in roadless areas than natural processes.

Over the last five years, Congress has spent over $57 million on scientific assessments for the Sierra Nevada Ecosystem Project (SNEP) and the Interior Columbia Basin Ecosystem Management Project (ICBEMP). Both of these studies concluded that commercial logging was the primary reason for increased wildfire intensity and severity. Moreover, these studies revealed that no matter what logging system was used (e.g. thinning, salvaging, or clearcutting), watersheds that were roaded and logged experienced more rapid rates of fire spread, higher fire intensities, and greater fire severity than unlogged, roadless watersheds. Conversely, the SNEP and ICBEMP studies also revealed that roadless watersheds have the highest levels of ecological integrity and the greatest resiliency to wildland fires—precisely because they have experienced less road-building, less logging, and less-efficient firefighting. Claims that roadless areas are more prone to so-called "catastrophic wildfires" because they are unroaded/unlogged are simply ignoring the Forest Service's own scientific research, and in our opinion, these unfounded claims are merely propaganda intended to serve the short-term economic interests of resource extraction industries, not the nation's long-term interests in ecological integrity and sustainable economies.

The superb articles published in the Forest Service's own Fire Management Today (Spring 2001, Volume 61, Number 2) documents that the best available science supports strong protection for roadless areas. For example, the article by DellaSala and Frost (2001) summarizes the findings of the scientific literature:

1) Timber management activities often increase fuel loads and reduce a forest's resilience to fire.

2) Areas without roads have been less influenced by fire suppression than intensively managed lands.

3) Widespread road access associated with intensively managed lands raises the risk of human-caused ignitions.

These comments were made available to the USFS during the original RACR public comment process, so this should not be new information to the CAT. The evidence is fairly clear: roading, logging, grazing, mining, and firefighting are the sources of, not the solutions to, most "forest health" problems in America's wildlands. (Organization, Eugene, OR - #A30352.30100)

ROADED ACCESS CAUSES MORE DAMAGE

Roads cause far more wildfire danger and ecological damage than they eliminate. It's campers who can easily get to wilderness areas by car or motorcycle that start fires, as happened in Washington State just this week. A mature forest that periodically has small, fuel-clearing fires is more healthy, and less likely to experience a wildfire, than a clear-cut "managed" forests. (Individual, No Address - #A470.30000)

Additional costs incurred by the American taxpayer include massive environmental damage to the public's natural resources from eroding forest roads. Forest roads, while providing some limited public access, also provide a conduit for many damaging, illegal, and dangerous activities while greatly increasing the threat of catastrophic fire. It is no coincidence that the majority of human caused forest fires start within 100 yards of forest roads started by ignition from vehicle exhaust systems, burning materials thrown from vehicles, sparks from machinery, abandoned campfires and arson. The most recent fatal forest fire claimed four firefighters' lives in early July of this year in the Okanogan National Forest in northern Washington State. The fire was started by an abandoned campfire left near a forest road. Forest roads also provide a conduit for invasion of exotic weeds, spread of insect pests, illegal dumping, illegal trespass and rampant poaching all of which are reaching epidemic proportions in various units of our national forest system. (Organization, Richland, WA - #A962.30000)

Forest roads provide a conduit for invasion of exotic weeds, spread of insect pests, illegal dumping, illegal trespass, arson and rampant poaching all of which are reaching epidemic proportions in various units of our national forest system. Failing to preserve our remaining roadless areas from road construction and other industrial activities could be one of the greatest threats to forest health of the 21st century. (Organization, Richland, WA - #A962.30100)

One of my favorite places on earth lies just within the George Washington National Forest. For two years I have hiked, fished, swam, encountered bear and thoroughly enjoyed nature here and I have already seen the negative effects of roads through the forest. With roads/paths made by men and their trucks, the lake has been over fished, water runs down the roads, eroding the mountain. The paths of streams now lie dry. I have also noticed a great amount more human activity due to these roads. This seems to be the most destructive force. Those that only come to these areas because they can drive there do not appreciate the area at all. It is a place to party for many, and often I will come upon my favorite area trashed, beer bottles and bags and just various litter strewn all over the ground. When our natural forests provide a greater challenge for us, it yields greater rewards. It forces the individual to make choices and conscious decisions to help keep these places available to all. (Individual, Harrisonburg, VA - #A4469.30100)

My 13 years working as a smokejumper gave me experience fighting fires in MT, ID, WA, OR, NM, CA, AZ, UT, WY. Some of the most destructive fires were on cut-over land and private owned forests with houses within the forest. Roadless areas are less likely to have fire ignition through careless human activities or arson. (Individual, Bozeman, MT - #A92.30100)

The Forest Service has indicated that logging is needed in the National Forests to protect them from catastrophic fires. Commercial logging does not prevent fires. Logging makes forests more susceptible to fire and disease. The Sierra Nevada ecosystem Project issued a report in 1996 that found, 'timber harvest, through its effects on forest structure, local microclimate, and fuel accumulation, has increased fire severity more than any other human activity.' Forests become drier, have less shade, and accumulate flammable debris in the form of slash piles. (Individual, Puyallup, WA - #A829.30100)

TIMBER REMOVAL CAUSES MORE DAMAGE

Logging, roadbuilding, and other management activities have been the primary degradation factor to forest ecosystems. Commercial logging intended for fuel reduction would likely increase the hazard of severe wildfires and the buildup of hazardous fuels. Recently, Huff et al. (1995) stated:

Intensive forest management annually produces high fuel loadings associated with logging residues. As a by-product of clearcutting, thinning, and other tree removal activities, activity fuels create both short- and long-term fire hazards to ecosystems. The potential rate of spread and intensity of fires associated with recently cut logging residues is high (see for example, Anderson 1982, Maxwell and Ward 1976), especially the first year or two as the material decays. High fire behavior hazards associated with the residues can extend, however, for many years depending on the tree species (Olson and Fahnestock 1955). Even though these hazards diminish, their influence on fire behavior can linger for up to 30 years in the dry forest ecosystems of eastern Washington and Oregon. Disposal of logging residue using prescribed fires, the most common approach, also has an associated high risk of an escaped wildfire (Deeming 1990). The link between slash fires and escaped wildfires has a history of large conflagrations for Washington and Oregon (Agee 1989, Deeming 1990).

Regeneration and several development patterns can have a profound effect on potential fire behavior within landscapes by enhancing or diminishing its spread (Agee and Huff 1987, Saveland 1987). Spatially continuous fuels associated with thick regeneration in plantations can create high surface-fire potential during early successional stages. This was evident in most of the roughly 275 hectares of 1-to 25-year-old plantations burned in the 3500-hectare 1991 Warner Creek Fire in the Willamette National Forest (USDA 1993). The fire moved swiftly through the openings created by past harvests, killing nearly all the regeneration but usually missing adjacent stands >80 years old.

Logged areas generally showed a strong association with increased rate of spread and flame length, thereby suggesting that tree harvesting could affect the potential fire behavior within landscapes.

In general, rate of spread and flame length were positively correlated with the proportion of area logged in the sample watersheds.

Increased rate of spread means that the perimeter of the fire will grow much faster. Generally, a faster perimeter growth makes a wildfire harder to contain. (Organization, Missoula, MT - #A613.30100)

The primary cause of increasing fire intensity and severity is a century of aggressive firefighting, commercial logging, livestock grazing, and road building. Analysis of the 2000 fire season revealed that the majority of burned acres were located in logged and roaded forests, not in roadless or wilderness areas. In its report on last year's fires, the Congressional Research Service concluded,

"Timber harvesting removes the relatively large diameter wood that can be converted into wood products, but leaves behind the small material, especially twigs and needles. The concentration of these 'fine fuels' on the forest floor INCREASES the rate of spread of wildfires."

In 1996 U.S. government scientists issued the Sierra Nevada Ecosystem Project (SNEP) report. The SNEP report found, "Timber harvest, through its effects on forest structure, local microclimate and fuel accumulation, has increased fire severity more than any other recent human activity." The scientists also determined that, "Fire severity has generally increased and fire frequency has generally decreased over the last 200 years. The primary causative factors behind fire regime changes are effective fire prevention and suppression strategies, selection and regeneration cutting, domestic livestock grazing, and the introduction of exotic plants." (Organization, Nevada City, CA - #A4941.30520)

The facts show that forests in roadless areas are much healthier and much less in need of management than forests in roaded and logged areas. The fire danger is also much less in roadless area. Roads and logging actually increase and size and severity of wildfires. Indeed, the team assigned to created a new management plan for Forest Service and BLM lands in the Interior Columbia Basin Ecosystem recently noted: Fires in unroaded areas are not as severe as unroaded areas because of less surface fuel, and after fires at least some of the large trees survive to produce seed that regenerates the area. Many of the fires in unroaded areas produce a forest structure that is consistent with the fire regime, while the fires in the roaded areas commonly produce a forest structure that is not in sync with the fire regime. Fires in the roaded areas are commonly more intense, due to drier conditions, wind zones on the foothill/valley interface, high surface fuel loading, and dense stands. *Evaluation of Environmental Impact Statement alternatives by the science Integration Team, Interior Columbia Basin Ecosystem Management Project, page I-281*

Therefore, the best way to protect roadless areas is to prohibit road building and logging as provided by the Roadless rule. Furthermore, even where road building or logging may be required, the Roadless Rule already allows such activities where necessary to protect the forest, or protect public health and safety from any threats from fire or other "catastrophic events." There is no need to make changes to the Roadless rule in order to protect these interests. (Organization, Boise, ID - #A8240.30100)

Management Exceptions

1459. Public Concern: The Forest Service should recognize that the Roadless Area Conservation Rule provides resource management exceptions.

TO RESTORE ECOLOGICAL PROCESSES

The Roadless Area Conservation Rule already provides exceptions that allow roadbuilding and logging when needed to address concerns of wildfires and forest health. Roads can be built to protect public health and safety from imminent wildfire threats and other emergencies. The rule also gives local forest managers discretion, on a site-specific basis, to thin small-diameter trees where needed to restore ecological processes, provide habitat for endangered species, and avert catastrophic wildfire. (Individual, Albuquerque, NM - #A817.30100)

The Roadless Rule already provides exceptions that allow roadbuilding and logging when needed to address concerns of wildfires threats and other emergencies. The rule also gives local forest managers discretion, on a site-specific basis, to thin small diameter trees where needed to restore ecological processes and reduce unnatural fuel loads, provide habitat for endangered specie, and avert catastrophic wildfire. The best way to maintain healthy roadless areas is to keep them roadless. Wildfires are much more likely to start in areas with roads. In fact, one of our two most recent devastating fires, were in

Washington, was caused by a spark from an automobile, driving along the road, in a logging induced, fuel-heavy forest. (Individual, Seattle, WA - #A4884.30100)

TO PRESERVE ACCESS RIGHTS

The Roadless Rule permits construction of roads in case of imminent threats of catastrophic events. It allows the cutting and removal of trees to reduce the risk of wildfire. So far 98% of fires in roadless areas have been controlled. Agriculture Department statistics show that most wildfires are ignited by human activities and start in roaded and logged areas.

The Roadless Rule does not affect these access rights. It allows road construction and reconstruction by Forest Service decision "pursuant to reserved or outstanding rights. . . ." The Roadless Rule does not prevent road maintenance or trail construction in roadless areas. (Individual, Porterville, CA - #A3631.30200)

TO CONTROL FIRES AND INSECTS

Right now fire fighters are using bulldozers to control a fire in the Mt. Zirkel Wilderness Area in Northern Colorado. They are using bulldozers in a Wilderness area. Was there any public comment on whether to do this? No. It was just done. The argument that this Roadless Area Conservation rulemaking will impede the control of fires and insects is ludicrous. Right now fire fighters are using motorized vehicles in the Mt. Zirkel Wilderness Area. This rulemaking will not prevent the Forest Service from protecting our forests. In fact, it will do the forest good in some cases to be burned or be ravaged by insects and disease. (Individual, No Address - #A4990.30100)

1460. Public Concern: The Forest Service should consider that the road building and timber removal exceptions to the Rule are too narrow to provide the needed flexibility.

INCLUDE A POLICY STATEMENT THAT ALLOWS LOCAL FOREST SUPERVISORS TO TAILOR FOREST PLANS AND RESPOND TO LOCAL CIRCUMSTANCES

The blanket prohibitions make it difficult for the Forest Service to respond to wildfires, pest infestations, and other catastrophic or unforeseen situations in the national forests. Temporary roads and/or timber management might be necessary in order to prevent destruction of segments of the national forests.

The so-called "exceptions" to the road building and timber harvest prohibitions are too narrow to provide the needed flexibility. Moreover, they will only serve as a point of focus that opponents will use to litigate any road. As a result, the current rule will foster increased litigation. A policy statement that allows local forest supervisors to tailor forest plans and to respond to local circumstances provides the necessary flexibility. (Individual, Eagle, ID - #A17754.30100)

1461. Public Concern: The Forest Service should define specific national criteria for management exceptions requiring roads in designated roadless areas.

Carefully define specific national criteria for consideration of any exception in the designated areas for how fire, wildlife, fish, forest health and any other legitimate management needs requiring roads can occur. (Individual, Lyons, NY - #A1737.30200)

1462. Public Concern: The Forest Service should constrain exceptions to Roadless Area Conservation Rule regulations by specific conditions and restrictions.

INCLUDING TIME LIMITS, SPATIAL LIMITS, DETAILED DESCRIPTIONS, AND MONITORING AND REPORTING

Conditions and Restrictions Should be Required for Each Exception Granted.

Each time an exception is granted, it should be constrained by specific conditions and restrictions. At a minimum, these should include:

1. Time Limits. The activity should be authorized for a period of time that is commensurate with the justification on which is based, with mandatory reviews of conditions giving rise to the exception at appropriate intervals.

2. Spatial Limits. The extent of authorizing activity should be the minimum found to be necessary to address the underlying justification, while enhancing roadless area values.

3. Detailed Description. The exception should be carefully defined in terms of: (1) actions that are authorized; (2) prohibitions on deleterious design/construction/implementation features; (4) restoration requirements (e.g., for roads, funding and requirements for proper removal of temporary roads); and (5) secure funding monitoring effects and for restoration.

4. Monitoring and Reporting. Appropriate monitoring and reporting (including funding) on authorized activities should be required in every case to ensure compliance with conditions and restrictions. (Organization, Washington, DC - #A23283.30200)

Roads/Access – Forest Health Management

Summary

General Comments – Access is a topic of comment to a number of respondents, particularly as it relates to forest health management. One general response is that the Forest Service should address the impacts of new roads in roadless areas on forest fires.

Funding – One tribal representative states that budget constraints and prohibitions on road development and maintenance will render many projects unfeasible and impose unacceptable risk on many roadless areas.

Roads/Access – Respondents urge the Forest Service to allow motorized vehicles and road construction/road access for forest health management—to ensure firefighter and public safety; to carry out forest health treatments; to reduce fire hazards; and to respond to natural hazards (e.g., earthquakes). In addition, an organization asks the Forest Service to comply with Revised Statute 2477 to maintain motorized access for forest health management. According to this group, "Almost all so-called 'roadless' areas actually contain an extensive network of RS-2477 roads and rights-of-way. If USFS obeys statute law—especially the RS-2477 savings provisions of FLPMA and the Section 108 prohibitions on redefinition of RS-2477s . . . and refrains from interfacing with county and individual RS-2477 maintenance and repair, the motorized access that is essential for forest health will usually be available."

Others assert that forest health should not be used as an excuse to build roads in roadless areas. These respondents state that road construction/road access should be prohibited because roads enable the introduction of exotic or invasive plants and animals; because adequate roads already exist for fire suppression purposes; and because roads won't stop fires. People suggest that in the event a road or temporary access is necessary for forest health management purposes, it should be restored as soon as possible after the event. Additionally, many assert that vehicles should be prohibited to prevent arson and wildfires and the spread of pathogens.

Roads/Access General

1463. Public Concern: The Forest Service should address the impacts of new roads in roadless areas on forest fires.

It needs to be pointed out that the present subject relates to new roads in roadless areas. The question should be limited to roads and not fires in general. It should be how do new roads in roadless areas impact forest fires, for better or worse? (Individual, Chico, CA - #A17483.11140)

Funding

1464. Public Concern: The Forest Service should consider that budget constraints and prohibitions on road development and maintenance will render many projects unfeasible and impose unacceptable risk on many roadless areas.

There are 66 million acres of national forest lands known to be at risk from catastrophic fires and another 58 million acres at risk from insects and disease. Many of these high-risk areas are located in inventoried roadless and unidentified "unroaded" areas and contain valuable spawning streams, critical wildlife habitat, timber, and other resources. Some of the high-risk areas are overly dense stands of trees

that need to be thinned, while others contain excessive accumulations of fuel, especially from dead and dying trees that need to be removed to reduce wildfire potential. Given budget constraints for stewardship purposes that the Forest Service faces annually, precluding further road development or in some cases maintenance of existing roads will render many projects unfeasible and impose unacceptable risk on many roadless areas. Passive management will not solve these problems.

For example, the CNF is presently suffering from a pandemic of spruce bark beetles which has devastated more than 95,000 acres of national forest land on the Kenai Peninsula. An arbitrary ban on road construction in areas along the Seward Highway which qualify as "roadless" (whether inventoried or un-inventoried) would preclude most management options (when economic viability is factored in) presently available to the Forest Service to deal with the extremely high forest mortality that has resulted from this insect problem. At this time, ecological and silvicultural considerations argue strongly against foreclosing options and for an open assessment of all appropriate management techniques. (Tribal Corporation, Anchorage, AK - #A20340.30100)

Allow Roads/Access

1465. Public Concern: The Forest Service should allow road construction/access.

FOR FOREST HEALTH MANAGEMENT

Local resource managers should be given flexibility to identify and implement alternatives which provide for construction of roads in order to access areas susceptible to or actively involved in insect infestation and disease resulting in tree mortality, including those areas designated as Wilderness. Construction of roads necessary for fuels reduction, timber stand improvement, watershed protection and preservation of habitat must be emphasized. Communities and private properties near and adjacent to federal lands should be protected from risks associated with wildfires through a combination of better forest management practices including but not limited to the following:

* Thinning tree density to a level which can be sustained in the local climate and soil conditions in a healthy condition;

* Mechanically reducing fuel levels, especially ladder fuels, to a level where controlled burning can be safely reintroduced and, when this has been accomplished, allowing natural fires to reassume their role in keeping fuel levels at a non-dangerous level;

* Utilizing the expertise of the forest pest management personnel to reduce insect infestation; and

* Utilizing environmentally sound logging practices to selectively harvest timber to keep tree density at healthy and sustainable levels and ensure an appropriate percentage of old growth. (Elected Official, Markleeville, CA - #A8597.30200)

Prescribed burning is an important management tool, but it has recently been experienced. This proposal that roads can be built into roadless areas when human safety and property are at risk, we applaud. However this is a backwards approach. Restoring ecosystem health will enable the forest to be more resistance to catastrophic stand replacing insect epidemics and fires that are already being experienced. A preventive approach is more appropriate. An obvious flaw in the proposal is the lack of an option to build roads to provide reasonable access to eliminate insect "hot spots" by controlling emerging beetle epidemics before they spread. A question that begs to be asked is, isn't the health of the forest ecosystem important enough to justify appropriate management which might include reasonable access provided by road construction and reconstruction? We suggest that acceptable conservation and management cannot be accomplished by the preservationist spirit of this presidential political motives proposal. The present social and environmental philosophy of preservation is very different from real preservation and ecosystem sustainability that can only be accomplished by proper conservation and management. Ecosystems need to be managed by good science not political agendas. (Professional Society, No Address - #A27584.30200)

FOR RESOURCE MANAGEMENT

How do you manage a forest without roads? To keep a forest healthy there must be access. Blowdown must be harvested for two reasons. 1.To prevent bug infestation and 2. To reduce the buildup of fuel. Fuel buildup must be kept at a minimum. Bug infestation must be detected and controlled. To manage the fuel buildup you have two options, but you must have access. To detect bug infestation you could use helicopters and satellite photos. Both of these options will mean loss of large amounts of timber before detection is accomplished. On the ground detection is much more viable. But you have to have access. Control can be accomplished by aerial spraying usually. (Individual, Miami, AZ - #A880.30200)

The existing roads have been built at considerable costs and should not be wasted.

The roads are needed for Fire Suppression.

The roads are needed for Rescue, public safety, and security.

The roads are needed for continued reasonable logging, some for timber value when stands are mature, some logging for the health of the forest, some to reduce major fire hazards. (Individual, Missoula, MT - #A4891.30200)

The forest planning process must give recognition to the importance of roads for fire suppression, access for emergency/rescue personnel, public safety, maintenance and service, and insect and disease treatment. Given the dynamic nature of forest conditions, flexibility in management activities is necessary and can only be achieved through exceptions to roadless management prescriptions. (Permit Holder, No Address - #A5285.30200)

Clearly, access to roadless areas is needed to promote the health of the forest and to allow for the harvest of insect- and disease-damaged timber and of wind-damaged timber stands. (Elected Official, Ketchikan, AK - #A17476.30100)

In ending I'll say we must be able to maximize fire fighting efforts in our forests. That translates into 'roads'. Four young firefighters died recently fighting the 30 mile fire here in Washington state. I read in the newspaper that helicopters were delayed going into the area because they needed first to obtain permission from a fisheries bureaucrat to fill their water bags from a particular stream with which to fight the fire. If this is true than virtual murder was committed to supposedly 'protect fish'. First we sacrifice citizen's rights for nature. Now we must sacrifice human life? This mentality in government is intolerable. (Individual, Lake Stevens, WA - #A8688.30200)

FOR FIRE HAZARD REDUCTION

Common sense should be utilized in any management decision. Allow enough roads in every area to quickly and easily fight any fires that occur, with minimal risk to fire fighters. Realize that managed logging to remove fuels, as well as remove dead or dying trees is necessary, and understand that birds and animals adapt and trees grow back, so reasonable logging to provide income for local schools, etc. can and should be done. (Individual, No Address - #A752.30000)

Closing our National Forests by this action causes our forests to be in much greater jeopardy from fire than were they more accessible by roads. It also puts the firefighters in more danger than they would be in were there ways to evacuate them in emergencies and to get equipment and supplies to them as they fight fires. (Individual, Amarillo, TX - #A533.30400)

Our forests are in extreme danger of fires, not to mention the mismanagement of our lands. Fixing this problem will take some time I agree, but how are we going to fight these fires when we have to wait for a key to a gate! We need to open up the roads that have been gated off over the years! Everybody I know cares dearly about our forests. Please open up the roads so we can care for them, our forests are in mostly needed of the sovereign states taking care of their own lands. I repeat – I oppose the Clinton roadless issue. (Individual, Kalispell, MT - #A1135.30200)

Roads are an integral part of protecting communities, homes, and property. All forms of mechanized equipment, vehicles, aerial support, chainsaws, and pumps are required in order to protect communities, homes and property. Some roads should be accessible only to administrators for protecting communities. Basically this means for fire protection and control of insects and diseases. (Individual, Aloha, OR - #A3675.30200)

Since the Gifford Pinchot era it has been recognized that access is key to economical management of the various forest treatments and activities, yet the Forest Service proposes to eliminate reasonable access forever to a major segment of the National Forest system while implying that forest treatments can still be accomplished.

The Forest Service is currently engaged in multiple wildfires in the west, and in almost every instance your own Fire Information Officers' are constantly being quoted as saying that the fire is difficult or impossible to control/contain because of lack of access with resultant inability to rapidly deploy resources coupled with the insufficient availability of airborne (the most expensive) resources, ad infinitum. (Individual, Seeley Lake, MT - #A8075.30200)

Local comprehensive planning should support strategic access for fire fighting; regional plans should recognize roads that serve no mutually held values, and these should be closed. (Individual, Elko, NV - #A23651.30400)

FOR THE USE OF HELICOPTERS FOR FIRE MANAGEMENT

Helicopters play important roles in wildland management and fire response. When conducting operations in remote locations, helicopters require ground support personnel, equipment and vehicles, none of which can move safely and effectively without some form of primitive road access.

These firefighters need primitive roads to permit them to access helicopter staging areas with needed equipment in an efficient manner. More importantly, these firefighters need primitive roads as escape routes if air evacuation becomes impossible. (Business, Alexandria, VA - #A30200.30600)

FOR FIREFIGHTER AND PUBLIC SAFETY

(Only a very small percentage of the population can enjoy a forest without roads.) Most importantly, the lives of our firefighters are at stake—their risks are high enough as it is! (Individual, Loveland, CO - #A22368.30200)

Roads in the forests are needed to save the forests from destructive wild fires. Firefighters drop into remote sites and can be killed if no equipment can reach them through the roads. DO NOT lock up the forests. (Individual, No Address - #A27509.30200)

The forests should have roads just to get at fires. Also to rescue campers or lost people. Please use common sense and not politics. The tree huggers are not realistic and are out of step with the real world. (Individual, Alexandria, VA - #A4984.30200)

FOR PEST MANAGEMENT

Management of problems and pests can best be managed with access. (Individual, Jarbidge, NV - #A8842.30200)

TO ALLOW RESPONSE TO ADDITIONAL HAZARDS SUCH AS LANDSLIDES, EARTHQUAKES, ETC.

There are additional hazards-related discussions and updates needed in the document. Many of the mapped landslides in Wyoming have dammed or nearly dammed streams or rivers. There is a real potential for streams or rivers to be dammed in the future, creating a significant risk to public health and safety. In areas with significant seismic hazards, the risk is amplified. Road access should be provided and maintained to the high hazard areas to facilitate a timely response when needed. It is too late to consider road construction into an area after a 100-300 foot landslide dam has formed, and as a result, the downstream population is placed at risk. This is tied to Section 294.12 of the proposed rule (page A-

27), which states that a road may be constructed or reconstructed if "A road is needed to protect public health and safety in cases of an imminent threat of flood, fire, or other catastrophic event." These hazards are rarely recognized before catastrophic situations arise. Again, it would be nearly impossible to build a road into a newly formed landslide dam in a timely manner to mitigate a landslide after the fact, due to the subsequent NEPA analysis and associated time frame that is mandated for such analysis. This proposed rule puts the public at increased risk. (Elected Official, Cheyenne, WY - #A22609.30200)

TO ALLOW COST-EFFECTIVE FOREST HEALTH TREATMENTS THAT CAN PROVIDE LONG-TERM PROTECTION OF WATERSHED QUALITY

Any rule should recognize that "protection" of roadless areas does not equate to protection of natural environments. Rather, what is being protected is an environment that has been altered through fire suppression and, in some instances, past lumbering that favored larger diameter trees. In many instances, reduction of fire frequency has resulted in a move toward denser and smaller diameter stands, with a greater component of later-successional species which are less resistant to fire.

Build up of ground and ladder fuels has created an environment prone to catastrophic wildfires. Catastrophic wildfires create concerns for watershed integrity. Intense heat may result in increased hydrophobic soils, so that peak flood flows increase and summer base flows decrease, resulting in streambank erosion, channel widening, and sedimentation. Instream and riparian habitat can be altered to the detriment of aquatic and riparian species. Thus, in many cases, long-term protection of watershed quality can be enhanced through construction of roads that allow cost-effective forest health treatments. (Governor, State of Idaho - #A20141.30400)

TO REMOVE DEAD TIMBER

There should be roads built every 3 or 4 miles where feasible, so dead timber can be harvested. I have traveled many miles in the West and have seen many acres of dead timber and was told it could not be cut! Other roads I have been on have large trees dead too amongst mostly live timber that could be cut and sold as to leave dead stuff for fire problems and help the timber shortage for lumber. (Individual, Turtle Lake, WI - #A6075.30520)

WITH THE RESTRICTION THAT ROADS BE OPEN ONLY FOR FIRE PROTECTION AND EMERGENCIES

Limited and VERY CLOSELY WATCHED harvesting of some of the forests can enhance their life of productivity and longevity. Some roads will have to be made including some in wilderness areas to remove burned, beetle infected, and build up of hazardous fuels. Some of these roads may be left open for future emergencies. The only time they can be used is for fire protection or other authorized emergencies by the Forest Service. These roads will be closed at the entrance by locked gates. Unauthorized trespass will be met with a fine, a term in jail and a ban from all national forests for no less than 5 years. If the penalty is great enough the next time they will think twice before they proceed. (Individual, Rock Springs, WY - #A5695.30200)

In short, new roads should be built only out of necessity such as for Fire control or medical Emergencies.

New roads for safety only seems to make sense. Lets try to make these minimal. (Individual, Salem, MA - #A8694.30200)

BECAUSE OTHERWISE STATE AGENCIES MAY NOT ALLOW THEIR FIREFIGHTERS TO ASSIST WITH FIREFIGHTING EFFORTS ON FEDERAL LANDS

Roads offer access to manage the public lands with prescribed burning, timber harvesting and wildfire control.

Roads are needed for accessibility for fire suppression forces. States have supplied significant firefighting resources on federal lands, but if safety concerns over access are not alleviated this may be greatly reduced in the future people cannot be placed in harms way with no retreat route (no roads). (Individual, West Point, UT - #A5415.30200)

1466. Public Concern: The Forest Service should allow road construction/access.

LOW IMPACT ROADS

Secondary access should be lower class roads built at much less cost but adequate for erosion control. These should be left open for fire emergency access, with access to the public controlled by locked gates. (Individual, Payette, ID - #A1049.40000)

As the owner of a small scrawler tractor, I know that access can be accomplished if very carefully done by smaller scale machinery and smaller scale vehicles with "roads" that are carefully built in small scale and with major view towards aesthetics, non-devastation of any kind, activities to help clear away the forest burdens. I believe some of the most dangerously overburdened areas, even though "roadless" need to be looked at in terms of dealing with these things. (Individual, No Address - #A5360.30100)

To the extent possible these areas should be maintained as roadless areas. Recreation and biodiversity should be given the highest considerations in management of these areas. These two values are not mutually exclusive as was sometimes suggested by the previous administration and some groups. The Forest Service already has more roads than it can maintain, so road construction in roadless areas should only occur in rare circumstances. If, after local planning, construction of a temporary road or other road is essential to provide for enhancement of wildlife, for firefighting or to improve forest health, new low-impact construction techniques should be employed. (Permit Holder, Knoxville, TN - #A29069.50100)

TEMPORARY ROADS

The prohibition against road building and timber harvest in the new policy runs counter to creating and maintaining healthy forests. Roadless areas would be at great risk for severe wildfires and disease and pest infestations. Local managers need the flexibility to authorize temporary roads for forest health projects. MCFB strongly urges the service to abandon the unofficial policy of "protection through non-management". The unique ecological characteristics of each national forest and its inventoried roadless areas require management direction at the local level with local input and local science instead of a national uniform mandate. As mentioned before this will require updating mapping so roadless areas can be overlaid with mapping of areas with disease or pest problems, severe fuel loads, etc. (Association, Alturas, CA - #A17770.30200)

1467. Public Concern: The Forest Service should include an alternative in the National Environmental Policy Act process that gives direction for road construction.

FOR FOREST HEALTH MANAGEMENT

One alternative in the NEPA process should be the direction that roads would be built for management of the resources including protection of forests from severe wildfires, the buildup of hazardous fuels, and to provide for the detection and prevention of insect and disease outbreaks. (Individual, McMinnville, OR - #A5106.30100)

1468. Public Concern: The Forest Service should allow the use of motorized vehicles.

FOR FOREST HEALTH MANAGEMENT

I have several concerns with the plan. First, its implementation would negatively affect the health of acres of national forest lands. The United States General Accounting Office has identified nearly 40 million acres of National Forest lands, some of which are already designated as roadless forest lands, that are at serious risk of catastrophic fire loss and bug infestation. By banning motorized vehicles on national forests, the proposal would limit the ability to fight forest fires and effectively manage our nation's forest lands. In particular, the inability to treat the pine beetle epidemic in the Black Hills National Forest could have dire consequences for my state. (United States Representative, South Dakota, - #A18062.30100)

To provide for healthy forest, leave the roadless areas alone. If there is a need to enter these areas for treatment of localized problems, that can be done by helicopter, draft horse, snowmobile, etc. They are roadless but not wilderness areas, so machines can be used. (Individual, Northfield, MN - #a22395.30100)

FOR FOREST HEALTH MANAGEMENT ONLY, WITH ACCESS PROHIBITED UNLESS AUTHORIZED BY A FOREST PLAN

Access for fire, disease control and salvage should be expressly allowed. All other road access should be prohibited unless otherwise authorized by a forest plan. (Business, Seattle, WA - #A20468.30200)

ALLOW HEAVY EQUIPMENT FOR FIRE CONTAINMENT AND OTHER MANAGEMENT NEEDS

The only tools available to the Forest Service appear to be those used for Wilderness areas. Continue to allow access on existing roads and trails. Heavy equipment use to contain forest fires and other management needs should not be prohibited in so-called roadless areas. Access and road construction should be allowed for other forest management activities. Timber harvest, removal of dead or disease trees should be exempt from the Rule. There is no such thing as a "severe" wildfire, there are just wildfires. There should not be any restrictions with respect to fire control and suppression severe or not. (Elected Official, Lander County, NV - #A27730.30000)

TO FACILITATE FIREFIGHTING IN WILDERNESS AREAS

Maybe more practical to provide access roads which would also facilitate firefighting in Wilderness areas. (Individual, Fernandina Beach, FL - #A16024.30200)

1469. Public Concern: The Forest Service should comply with Revised Statute 2477.

TO MAINTAIN MOTORIZED ACCESS FOR FOREST HEALTH MANAGEMENT

Almost all so-called "roadless" areas actually contain an extensive network of RS-2477 roads and right-of-ways. If USFS obeys statute law—especially the RS-2477 savings provisions of FLPMA and the Section 108 prohibitions on redefinition of RS-2477s . . . and refrains from interfacing with country and individual RS-2477 maintenance and repair, the motorized access that is essential for forest health will usually be available. (Organization, Tonopah, NV - #A20337.20208)

1470. Public Concern: The Forest Service should modify the criteria for roadless designation to allow the construction of new roads for fire and disease management.

BECAUSE THEY ARE LESS DAMAGING THAN ROADS CONSTRUCTED DURING FIREFIGHTING

The wide sweep of human impacts on Forest Service lands makes the traditional criteria for roadless designation less than realistic. We think a substantial case can be made that some degree of access must be provided to all lands, particularly in the West, where there is continuing need for fire and/or insect infestation response and prevention activities. This is particularly true where Forest Service lands pose a threat to private lands or public active-use areas. In some cases this access can be obscured to maintain an unroaded appearance. To us, it seems a better solution to have an engineered alignment available to enter areas rather than having to resort to the heavy-handed approach that is often necessary during an emergency response even though pre-emergency work may violate the contemporary "roadless" definition. (Association, Sacramento, CA - #A15787.25000)

1471. Public Concern: The Forest Service should maintain trails.

FOR FOREST HEALTH

Provisions should be stipulated in the final rule to allow exceptions in the management constraints in order to avoid the build up of hazardous fuels, allow for the suppression of catastrophic fires and to provide for the detection and prevention of serious insect and disease outbreaks. Existing trails should be

maintained to an acceptable standard and where desirable new trails maybe be constructed in order to facilitate management activities and to provide public access. (Individual, Eagle, ID - #A3368.30100)

Do not Allow Roads/Access

1472. Public Concern: The Forest Service should not use forest health as an excuse to build roads in roadless areas.

BECAUSE IT IS COST PROHIBITIVE

Money should not be available to build roads to manage forests from wildfires, buildup of fuels and to provide prevention of insect and disease outbreaks for it would be cost prohibitive plus I see this as an end round to allow logging at an economic loss. (Individual, Sequim, WA - #A16967.17100)

BECAUSE FIRES WILL BURN AREAS REGARDLESS OF THEIR ROADED/ROADLESS DESIGNATION

We know there is great concern among some that roadless areas are high fire hazard areas and that unless they are roaded and logged the accumulation of fuels will lead to catastrophic wildfires which will incinerate already roaded regions. It is true that roadless areas have high fuel loads. But the same is true of already roaded areas, which burn just as fiercely as roadless areas. The Tyee Fire on the Entiat River of the Wenatchee N.F. in 1993 burned just as hot in roaded areas as it did in unroaded ones. After the fire, some of the roaded areas were salvage logged. Result: roaded areas had less of a legacy of large logs and course woody debris with which to start next stands of trees. That meant less soil moisture, less habitat for fungi colonization and less cover for predators of gophers, all of which added up to less healthy trees and a degraded forest. Under some circumstances, fire in roadless areas will spread into managed forests, just as fire in roaded areas sometimes invades roadless areas. But that is no argument for roading roadless areas, unless one thinks the Forest Service can always control fires in roaded areas. The fire seasons of 1960, 1970, 1988 and 2000 showed that neither the Forest Service nor anyone else can stop fires in roaded areas in severe fire weather. Putting roads into roadless areas will do nothing to prevent conflagration fires. (Individual, Portland, OR - #A6269.30200)

Though there is some truth to the idea that fire suppression has, in some areas, created excess of combustible material ("hazardous fuels buildup") it has been greatly exaggerated, and is certain to be used as an excuse for logging, and escape environmental regulations, if local planners are given new opportunities to override the Roadless Area Conservation Rule. It is easy to demonstrate that extreme drought has much more to do with catastrophic wildfires than excess fuel, and it is very likely that global warming plays a much greater role in the growing number of forest fires. Even tropical rain forests have been the victims of conflagrations in recent years. (Individual, Hatboro, PA - #A17830.30100)

IN THE TONGASS NATIONAL FOREST

Under the Forest Service's current plans for roadless areas of the Tongass, the level of road building is completely unjustifiable. The Tongass is scheduled to provide half of all Forest Service timber that is cut from roadless areas in the next five years. More than 80 percent of all new roads in roadless areas in the entire Forest Service system will be built in the Tongass.

That level of road building is not justified by the "forest health reasons" mentioned by Chief Bosworth on several occasions when he discussed reasons for building roads into roadless areas. The two most commonly used "forest health" excuses for continuing to log roadless forests in the Lower 48 do not apply in the Tongass. The Tongass is still dominated by old-growth stands, so it does not require thinning or treatment to mimic original forest condition and improve wildlife habitat. And because it is a rainforest, with an average of roughly 100 inches of rain a year, fuel loading and fire suppression are not an issue. (Organization, Sitka, AK - #A30486.45623)

1473. Public Concern: The Forest Service should prohibit road construction.

BECAUSE ROADS CAN SPREAD DISEASE AND NOXIOUS WEEDS

Here in California we have a fungus that is quickly adapting to attack and kill more and more species of trees. It is a close relative to the Port Orford cedar disease that has nearly eliminated the species in the western US, and which has been spread on the tires of logging equipment. The more roads, the more areas threatened by diseases known and unknown. (Individual, Sebastopol, CA - #A122.31200)

Building more roads will INCREASE the spread of disease and reduce forest health. Vehicles, including logging trucks and equipment, can spread disease. Two examples are the Port Orford Cedar root disease and Sudden Oak death in California. The Forest Service's own literature backs this up. (Individual, McKinleyville, CA - #A1269.31200)

Exotic weeds are already a major problem in roaded areas of our National Forests. If we continue to build roads in the National Forests here in Western Montana, the result will be to completely destroy the unique and wonderful character of this region, and to destroy its value and appeal for people like myself. (Individual, Lakeside, MT - #A3729.31300)

I am using Geographic Information Systems to predict the likelihood of an area containing Port Orford Cedar becoming infected by Phytophthora lateralis (Port Orford Cedar Root Disease). My study area is located within the Smith River National Recreation Area. The Port Orford Cedar in this area is heavily infected by P. lateralis.

Vehicles traveling along roads are known to be the main source of new infections. The disease does not occur where roads to not exist. The same scenario applies to many other exotic pathogens and plant species (Yellow Star Thistle). (Individual, Arcata, CA - #A1098.31221)

Disease and insect damage is even less an issue in roadless areas. Many of the major timber infestations occur in the monoculture tree farms which replace the forests that were clearcut earlier. When specific diseases do manage to invade the wilderness and roadless areas, it's often because they are brought in on the wheels of off-road vehicles. The Roadless Area Conservation Policy adequately evaluated the issue and found, "The percent of area at risk in inventoried roadless areas is about the same as the percent of area at risk for all NFS lands." (Roadless Policy FEIS, Vol. 1, p. 3-119) Further, "Invasion of nonnative species, is one of the most important issues in natural resources management today, with more than 6000 species originating outside the United States. Since roads provide an entry way for nonnative species, inventoried roadless areas can act as strongholds against invasion of these species." (Roadless Policy FEIS, Vol. 1, p. 3-126) (Individual, Eugene, OR - #A15583.31200)

It is the presence of roads, rather than roadlessness, that threatens the health of the forest in other ways as well. Thus, the spread of non-native, invasive plants is greatly enhanced by roads, even those that are unpaved and rarely traveled. A prime example is *Microstegium vimineum* (Japanese grass) that has recently become a real threat to native plant diversity throughout the eastern U.S. (Organization, Oak Ridge, TN - #A8073.30100)

"Invasion of non-native species into North American ecoregions is one of the most important issues in natural resource management today . . . Unfortunately, the ability of natural resource managers to eliminate invasive species, once they have become established is often very limited." (DEIS 3-47) A multitude of negative impacts to native species and ecosystems results from these invasions; invasions that are usually the result of human disturbance or facilitation. "Without any of the ground disturbance and ecological edges associated with timber harvest and combined with a 75% reduction in road construction and reconstruction, this alternative [#4] would provide the greatest assurance that these areas would retain current levels of resistance to the introduction and establishment of many non-native invasive species." (DEIS 3-91) This writer's personal experience has revealed cut-over sites and road

edges overrun with invasive species such as the Asian tree-of-heaven on the GW - JNFs (see, e.g., the Icy Hopper timber sale area adjacent to the Thunder Ridge Wilderness Area on the Glenwood Ranger District of the JNF). (Individual, Staunton, VA - #A29325.31300)

BECAUSE ROADS AND DISTURBANCES ENABLE EXOTIC PLANTS AND ANIMALS TO ENTER PREVIOUSLY UNDISTURBED AREAS

I am keenly aware of the impact of roads of enabling invasive species to make "inroads" into previously undistributed, uninfested areas. Much of the distribution of red imported fire ants can be traced to colony movement along roadsides and power line easements. I feel that making new roads into roadless areas is asking for more trouble than benefits. A good case in point is the health, economic and ecological costs of the fire ant in the southeastern United States alone; they are tremendous. Then consider that most ecologically damaging species, both plants and animals, are dispersed and thrive in disturbed areas such as roadsides. It is high time that we figure in the long-term costs of ecological damage in our cost/production/benefit decisions. (Individual, College Station, TX - #A26846.31220)

Biological Invasion: Roads enable invasive plants and animals, many of which are non-native, to expand their ranges to the detriment of native plants and dependent species. Exotic species often thrive in the environments created by roads and can also be inadvertently transported by vehicles. Roads create open edges to forest which make species more vulnerable to pest epidemics, invasion by nonnative species, and nest parasitism. Examples include; weeds, such as spotted knapweed; aggressive brood parasites, such as the brown-headed cowbird; and pathogens, such as cedar root rot. (Organization, Boise, ID - #A20853.30100)

BECAUSE BOAT TRAILERS CAN INTRODUCE EXOTIC SPECIES TO WATERSHEDS AND LAKES

I am writing to express my concern over the possibility that more roads would be built near the BWCA. I am a cabin owner on a remote lake which has no road to it and I like it that way.

The BWCA should have a sizeable no road buffer zone around it preserved for several reasons. Roads that cross water would allow the access of boat trailers which are the main route that exotic species such as Eurasian Milfoil are introduced. I believe canoes are not a significant source of these exotics but trailers are. (Individual, Clear Lake, IA - #A8885.45621)

Wild areas are becoming increasingly rare and once a road is cut the signs of the road remain for centuries.

One of my concerns is keeping lakes which are remote from having road access. Efforts to keep Eurasian Milfoil and other exotic species from permanently altering lakes throughout the midwest are basically failing.

Boats on trailers are the source of exotics and keeping roads from remote lakes which can only be accessed by canoe is about the only way to prevent such introductions. (Individual, Clear Lake, IA - #A8886.45622)

BECAUSE ADEQUATE ROADS EXIST AND ARE NOT NEEDED FOR FIRE SUPPRESSION

As a professional wild land fire fighter, I never did not make it to the fire I was dispatched to suppress, for lack of a road. In those areas where wildfire burned with no road access, we walked or were ferried in by helicopter, and on occasion, teamed up with smokejumpers that had parachuted in. Saying we need to build roads into roadless areas for the sake of preventing severe wildfires is a scare tactic used to inflame the uneducated public. (Individual, Gridley, CA - #A3712.30200)

This is another red-herring, I suspect, the implication being that we need these roads in order to get in proper fire suppression tools. We don't. (Individual, No Address - #A49.30200)

As a 15-year Montana firefighter, I can testify that the Roadless Area Conservation Plan is no hindrance at all to wildland firefighting, whose personnel, resources and techniques are well adapted to firefighting without roads.

The FS's mandate is resource protection—preservation of ecosystems and habitat—fire creates these rather than destroys them.

Please adopt the plan in its present form! (Individual, Billings, MT - #A6512.30400)

Roadless areas have prospered without roads for millennia. There is no evidence that roads are necessary to ensure their continued health. The Forest Service does almost all of its insect and disease surveys aerially; thus roads are quite unnecessary for that purpose. So-called "severe" wildfires are generally quite natural stand-replacing fire events that have been occurring in our forests for thousands of years. Forest types in most roadless areas have not been adversely affected by fire suppression during the last fifty years. These forests do not burn frequently and when they do burn usually do so in stand-replacing fires. Thus there is no ecological justification for road construction or silvicultural activities in these forest types. (Individual, No Address - #A12607.30200)

BECAUSE FOREST SERVICE PERSONNEL CAN ACCESS ROADLESS AREAS BY OTHER MEANS

The best way to manage for healthy roadless areas is to access on foot, by horseback or on appropriate occasions by mountain bike and helicopter. In areas in need of "heavier" temporary restorative approaches temporary snow roads or airstrips can be established, the work performed, and the road or airstrip restored back to its natural habitat. (I used a mountain bike very successfully in conducting ecological inventories and identifying or adjusting avoidance, mitigation and restoration measures). The existing rule already provides exceptions for roadbuilding and logging to address wildfires and forest health. According to the Forest Service, only 2% of inventoried roadless areas are at combined risk of insects, disease, and fire, and about 98% of fires in roadless areas have been ecologically managed without the need to construct roads. This is because roadless areas have been naturally self-sustaining and have not been impacted by the often heavy impact of man. (Individual, Watsonville, CA - #A6767.30100)

Detection—of whatever—certainly does not require a road. Most Forest Service employees ought to be capable of walking or riding a horse to determine the status of ecological variables in roadless areas. Fires that might threaten values outside of roadless areas can be detected as they are now—by lookouts or by aerial patrol. (Individual, West Glacier, MT - #A5946.30100)

Roads are not needed to help manage healthy forests. Hazardous fuel build up could be controlled by control burns. These burns can be applied by forest service rangers, who can hike into roadless areas or be dropped off by helicopter. (Individual, No Address - #A17702.30200)

BECAUSE HELICOPTERS CAN BE USED FOR CONTROLLED BURNS AND AIR TANKERS CAN BE USED FOR FIRE SUPPRESSION

The protection from "severe wildfires and the buildup of hazardous fuels" can also be managed without the use of roads. The field ecologists and biologists already walking the woods could identify such problems. In such cases controlled burns using helicopters, and air tankers for suppression would be a viable alternative to road-building.

If roads were to be built into areas that are in danger of severe wildfires, it makes them more accessible to careless individuals who may start fires. Electrical storms start enough fires, introducing a human element is not necessary. (Individual, Walla Walla, WA - #A17698.30200)

BECAUSE ROADS WON'T STOP FIRES

Here are 2 more Montanans who would very much like to keep our remaining "roadless" areas, roadless.

Also, it's very interesting to drive through the Bitterroot Valley in western Montana and look at the land that burned so bad last year. The one thing that really shows clearly through the destroyed timber is all the logging roads! Now "they" really did a great job of stopping those fires didn't they! (Individual, Victor, MT - #A21302.10150)

AS A GOOD WAY TO MANAGE WILDFIRES

You have asked us to respond to ten questions. Among these is the question of wildfire control. Preventing road construction is a good way to manage wildfires. When roads are not maintained, as more and more of our roads in the National Forests have become, they become built up with brush and tinder. These roads make fires fiercer and spread more quickly. They provide minimal access for firefighters. Roads also promote logging, which generally culls the largest, fire-resistant trees and leaves behind highly inflammable debris. Fire management goals will be best served by protecting our roadless areas. (Individual, Claremont, CA - #A15513.30400)

In terms of the goal for protecting roadless areas from severe fires, logging roads have a paradoxical effect: they are places where wildfires can be contained, but are also places where wildfires are often ignited. A significant portion of human-caused wildfires are, in fact, ignited alongside roads, and as a general rule increased road access results in increased risk of human-caused wildfires. Thus, while to some extent roads may help to suppress wildfires, roads can also hinder the agency's efforts to prevent wildfires. The link between arson fires and logging roads is particularly strong, an arson is the most difficult kind of human-caused wildfire to prevent. Unfortunately, forest arsonists are rarely captured or convicted, and the vast network of logging roads carved into the National Forests has greatly increased the burden on fire prevention and law enforcement patrols. The net effect is less protection of wildlands from severe fires due to the increase in number and frequency of human-caused ignitions, often during extreme fire danger situations.

In terms for fuels management, logging roads break up continuous fuel beds with wide swaths of non-combustible dirt and gravel; however, highly flammable vegetation (e.g. grass, brush, conifer saplings) often grows in the exposed, disturbed sites alongside roads. This accounts for many wildfires being easily ignited by the exhaust or cigarette butts tossed from passing motorists. More significantly, most National Forest roads travel through and to logged areas. Commercial logging produces large amounts of flammable dead surface fuels.(e.g. "slash" and "cull" logs), followed by revegetation from grass and brush, or replanting with young conifer saplings.

The best available scientific research has demonstrated that wildfires tend to spread more rapidly, with higher intensity and greater severity, when they burn through roaded and logged landscapes compared to unlogged roadless areas. Fires entering plantation zones and other intensively managed areas are prone to sudden "blow ups," creating major conflagrations such as occurred on the 1994 Tyee Fire in Washington State. (Organization, Eugene, OR - #A21798.30100)

1474. Public Concern: The Forest Service should obliterate any roads or temporary access required for forest health management as soon as possible after the event.

Wildfire protection: Emphasis should be on immediate detection of lightning strikes and fire fighting from air. One of the USFS fire chiefs told me that roads were not necessary to fight fire in this day and age. I believe this to be true. Roads that are bladed for required fire fighting should be obliterated immediately after the fire. (Individual, Buffalo, WY - #A19769.30200)

I nevertheless believe that fire suppression is appropriate when necessary to prevent a fire from expanding in size to consume more than, say, 20% of the available roadless area or forest. In pursuit of such a goal, the bulldozing of fire lines and other damage associated with fire fighting is acceptable—but only if all evidence of fire fighting is required to be obliterated within the next year. A significant portion of the fire fighting budget should be reserved for this purpose. Likewise, for catastrophic fires that consume more than, say 20% of the available forest, limited replanting should be allowed when, on a case-by-case basis, it is found to be necessary. Once again, however, any temporary access ways created for that purpose should be obliterated within a year. The creation of these temporary access ways does not alter the general rule that developed roads should never be established in roadless areas. (Individual, Pendleton, OR - #A30482.30400)

Healthy forests are not laced with roads. Inventoried roadless areas should be managed under the emergency conditions stated in the promulgated Rule, allowing new roads when there are certain risks to public health and safety from insects, disease, and fire. Only a tiny amount of roadless areas are subject to these combined risks—less than 2% according to the USFS. These areas should be managed in a way that reduces the risks WITHOUT road-building. If a road is absolutely essential because of some circumstance, it should be reclaimed immediately after a treatment is completed, so that the deleterious effects of forest roads on surface hydrology (erosion/excess sedimentation, habitat segmentation, weed invasion, enhanced fire danger, etc.) will not severely degrade the area. (Individual, Sebastopol, CA - #A2353.30100)

Access into and across roadless areas managed as roadless is needed to reduce insect and disease damage on both national forest land and other adjacent forestland. After salvage harvest activities, roads and other temporary infrastructure can be retired. (Business, Seattle, WA - #A20468.30200)

1475. Public Concern: The Forest Service should prohibit vehicles in roadless areas.

TO PREVENT ARSON AND WILDFIRES

As for wildfires, keeping both off-road and on-road vehicles out of the forest is among the best ways of preventing arson and wildfires started by man and/or machine. (Individual, Clayton, GA - #A15320.30100)

Many fires are started by people going out on the roads in vehicles, and then leaving unattended campfires, throwing lit cigarettes out their car windows, sparks may come from their muffler, or arson is not an uncommon occurrence. Arsonists are not known to hike deep into the wilderness to start their fires, and in fact often do their satanic deed by throwing flaming material out their car window.

This leaves the roads to administer the rest of the fires that are caused by weather. Consider for the sake of assumption that these fires are in fact a manifestation of weather. Then try to tell me that you can stop the rain!

Fire is a great political football because people want so desperately to believe in certainty and politicians don't get elected by telling people that certainty is an illusion in many cases. (Organization, Arcata, CA - #A21665.30430)

Logging exacerbates fire risk. Road building allows easier access to the backcountry by meth lab operators and other irresponsible individuals whose activities are fire hazards. So-called salvage logging removes the trees that should remain, while destroying wildlife habitat. The Rules as written provide for emergency road building and forest health. (Individual, Seattle, WA - #A17886.30500)

As for wildfires, keeping both off-road and on-road vehicles out of the forest is among the best ways of preventing arson and wildfires started by man and/or machine. Mother Nature did a pretty good job of managing forests for hundreds of thousands of years, I think a light touch from the hand of man would be a fine approach to forest management - it's cost effective too. Also, the build up of "hazardous fuels" is mostly a problem due to forests having been previously altered by logging (slash left on the ground after logs removed) and it is mostly a western forest issue. The Southern Appalachian roadless areas near me are the few areas in the Southeast that have NOT been logged extensively, so the "fuel build-up" is less of a factor in these forests than almost anywhere else in the entire national forest system. (Individual, Atlanta, GA - #A26430.30100)

TO PREVENT THE SPREAD OF PLANT PATHOGENS

On the Six Rivers and Klamath National Forest off-road vehicle use is a primary vector for spreading the plant pathogens that kill the endemic Port-Orford cedar. (Organization, Arcata, CA - #A21665.31200)

Timber Removal

Summary

General Comments – Timber removal is a topic of comment to a number of respondents, particularly as it applies to forest health. Several people ask that the Forest Service not allow volume and revenue targets to drive silvicultural decisions because, they believe, commercial harvesting usually takes the most fire-resistant trees.

Adequacy of Analysis – Some respondents urge the Forest Service to acknowledge that fuel buildup and undergrowth is a natural part of forest progression and forest ecology. They state that fuel buildup and undergrowth are not a result of timber harvest and that other contributing factors should be considered. At the same time, organization states, "Before any actions are taken to thin and clear, a thorough analysis should be performed which gives the benefits and harms of the actions." According to another group, scientific evidence does not support the hypothesis that intensive salvage, thinning, and other harvesting activities reduce the risk of catastrophic fire.

Funding – Several respondents comment that funding should be allocated for timber removal for forest health management. One individual urges the Forest Service to fund thinning projects. Another individual states, "The increased costs of fuel treatments must be addressed. Eliminating such large tracts of land from motorized fuels and firefighting efforts is a disaster in the making. On one hand we have the agency saying we must greatly increase fuels treatments and now on the other we have the agency virtually eliminating cost effective fuel treatments since motorized access to large areas will be eliminated." One individual suggests that "previous harvesters should be fined to recover any future loss due to severe wildfires and buildup of hazardous fuels, as well as any insect or disease damage."

Timber Removal – Respondents assert that timber removal should be allowed to reduce wildfire and insects and disease. According to one individual, "There is NO QUESTION that timber harvest has to be returned to the equation to provide for healthy forests which will protect them from insects, diseases, and catastrophic fires." Respondents also add that timber removal is necessary to restore natural fire regimes and to ensure firefighter safety. People suggest a number of conditions they say should be imposed on timber removal. Suggestions include harvesting only trees that are 24 inches on the stump, trees less than 14 inches in diameter or 50 years old, mature trees which have not yet lost their commercial value, and old growth. People also recommend certain types of removal—including clear cutting, salvage removal, selective timber harvest, and fuel thinning—each type subject to several suggested conditions. Several people also suggest firewood collection be allowed in order to reduce fuel loads and fire hazards.

Other respondents assert that the Forest Service should not use forest health as an excuse to remove timber. These respondents say that timber removal should be prohibited because it increases fire severity and risk. Some specifically request that clear cutting be prohibited. Others suggest that salvage timber harvest be prohibited after fire or insect and disease outbreaks. Additionally, some respondents request that thinning be prohibited in moist or high elevation forests because, they assert, it is cost prohibitive, because silvicultural activities do more harm than good, and because these areas should not be disturbed.

Timber Harvest General

1476. Public Concern: The Forest Service should not allow volume and revenue targets to drive silvicultural decisions.

BECAUSE COMMERCIAL HARVESTING USUALLY TAKES THE MOST FIRE-RESISTANT TREES

This suggestion should not be construed to support commercial sawlog extraction: the attempt to combine salvage logging with commercial logging in the past has usually taken the fire-resistant live green trees and left the brush which creates the fire hazard in the first place. Volume and revenue targets should not be permitted to drive silvicultural decisions, as they did under the 1996 Salvage Rider. (Individual, No Address - #A4777.30500)

The General Accounting Office noted, 'Most of the trees that need to be removed to reduce accumulated fuels are small in diameter and have little or no commercial value.' The report found that Forest Service managers were tending to focus logging on areas with high-value commercial timber rather than on areas with high fire hazards and would include more large, commercially valuable trees in a timber sale than those simply necessary to reduce the accumulated fuels. So called logging for fire protection became logging for the economic value of the timber. (Individual, Puyallup, WA - #A829.30100)

Prohibit the use of commercial timber sales for hazardous fuels reduction projects. Commercial logging removes the most ecologically valuable, fire-resistant trees, yet leaves behind highly flammable small trees, brush, and logging debris. The financial incentives for abusive logging under the guise of "thinning" must be eliminated. (Organization, Nevada City, CA - #A4941.30520)

Adequacy of Analysis

1477. Public Concern: The Forest Service should recognize that fuel buildup and undergrowth is natural for forest progression and forest ecology.

DO NOT PLACE BLAME ON COMMERCIAL TIMBER REMOVAL

Protecting Forests: The current Roadless Area Conservation Rule adequately addresses issues of fire management. With all the current rhetoric on fires and fire management, it is important to look at the facts in an unbiased way. Yes, the number and intensity of fires have been increasing since the 1950s, and the 1990s was one of the worst decades for fires in recent history. But, when you look at the locations of the fires, it is clear that fires increased in forests and in areas of sage brush, manzanita, chaparral, etc.—ecosystems that do not have trees! The increase in fires can not be blamed on limitations placed on commercial logging. The forest industry is trying to use this highly emotional issue for their own political agenda and profit. (Individual, Reno, NV - #A5109.30400)

CONSIDER OTHER FACTORS THAT CONTRIBUTE TO FUEL BUILD UP

Fire is a natural thing in forest ecology. Though it is true that there is an increase in combustible substance, as a result of over zealous fire suppression, the degree to which this is responsible for the recent increase in forest fire, is very questionable. In the year 1910 there were more big hot fires, more acres burned, and more fire fighters killed than in any year since, and that was before fire suppression. The 1910 fires were caused by drought, and drought caused by global climate change may well be the major factor in the increase in fires today. After all there have been enormous and unprecedented fires in tropical rain forests in recent years, and this certainly has nothing to do with "Hazardous fuels buildup." (Individual, Hatboro, PA - #A8834.30310)

1478. Public Concern: The Forest Service should analyze the benefits and harm of thinning and clearing projects.

BEFORE UNDERTAKING ANY ACTION

Inventoried roadless areas should be given as little vegetation management and protection from diseases as possible. Before any actions are taken to thin and clear, a thorough analysis should be performed which gives the benefits and harms of the actions. Benefits might be a reduction of fire risk to neighboring communities and more suitable habitat for a rare species. Harms might be degradation of habitat for wildlife and loss of aesthetic values. (Organization, Blue Jay, CA - #A29236.31200)

1479. Public Concern: The Forest Service should consider that scientific evidence does not support the hypothesis that intensive salvage, thinning, and other harvesting activities reduce the risk of catastrophic fire.

Scientists have doubts about the efficacy of intensive [management] as fire-proofing methods. DellaSala, et al. (1995) state:

Scientific evidence does not support the hypothesis that intensive salvage, thinning, and other logging activities reduce the risk of catastrophic fires if applied at landscapes scales . . . At very local scales, the removal of fuels through salvage and thinning may hinder some fires. However, applying such measures at landscape scales removes natural fire breaks such as moist pockets of late-seral and riparian forests that dampen the spread and intensity of fire and has little effect on controlling fire spread, particularly during regional droughts . . . Bessie and Johnson (1995) found that surface fire intensity and crown fire initiation were strongly related to weather conditions and only weakly related to fuel loads in subalpine forest in the southern Canadian Rockies . . . Observations of large forest fires during regional droughts such as the Yellowstone fires in 1988 (Turner, et al. 1994) and the inland northwest fires of 1994 . . . raise serious doubts about the effectiveness of intensive fuel reductions as "fire-proofing" measures. (Organization, Missoula, MT - #A613.30500)

Funding

1480. Public Concern: The federal government should fund Forest Service thinning projects.

TO REMOVE FUEL BUILD UP

I feel that the Federal Government needs to better fund the Forest Service to allow removal of underbrush that tends to turn into the very fuel that sustains major wildfires. (Individual, Colorado Springs, CO - #A22203.30100)

1481. Public Concern: The Forest Service should address the increased costs of fuel treatment.

The increased costs of fuel treatments must be addressed. Eliminating such large tracts of land from motorized fuels and firefighting efforts is a disaster in the making. On one hand we have the agency saying we must greatly increase fuels treatments and now on the other we have the agency virtually eliminating cost effective fuel treatments since motorized access to large areas will be eliminated. (Individual, Alturas, CA - #A28581.17220)

1482. Public Concern: The Forest Service should fine previous timber harvesters.

TO RECOVER ANY FUTURE LOSS DUE TO SEVERE WILDFIRES, BUILDUP OF HAZARDOUS FUELS, AND ANY INSECT OR DISEASE DAMAGE

Previous harvesters should be fined to recover any future loss due to severe wildfires and buildup of hazardous fuels, as well as any insect or disease damage. (Individual, Boise, ID - #A674.30700)

Allow Timber Removal

1483. Public Concern: The Forest Service should allow timber removal.

TO REDUCE FIRES, INSECTS, AND DISEASE

I support reopening the forests to logging and reopening of closed roads to protect our forests from wild fires and using the forests for wood production. Without the loggers cutting old timber and clearing heavy brush that has almost made all of our remaining forests a fire hazard and severely reduces the usage of the forests. The Forests were in much better condition while logging was the rule and I would hope that good logging practices will help our forests recover from the last ten years of attack by environmental wackos. (Individual, Young, AZ - #A1083.90510)

There is NO QUESTION that timber harvest has to be returned to the equation to provide for healthy forests which will protect them from insects, diseases, and catastrophic fires. Areas in high altitudes, areas adjacent to streams or areas which would be subject to extreme erosion should not have logging or road building in them. However, harvest of all dead and dying timber outside the above categories should be immediately put into a sales program that forbids appeal by any and all environmental groups. (Individual, Whitefish, MT - #A5102.30100)

As a former USFS employee on the Davy Crockett and Angelina Ranger Districts in the National Forests in Texas, I can tell you that I am well aware of the areas that have already been set aside in the RARE I and RARE II programs, and it is a travesty as to what has happened to those areas due to the "no management" policies. We have seen both the designated Four Notch and Indian Mounds wilderness areas obliterated by Southern Pine Beetle infestation, and grow back in briar patches that even my dog has no desire to explore.

When we should be harvesting these trees in an effort to control mortality due to insect infestations, we are instead allowing the dead and dying trees to rot, and entering healthy, less mature forests, for timber harvesting to supply our nation's needs. (Individual, No Address - #A5081.30100)

Management to achieve this type of forest [uneven aged] should be by regulated harvest and stocking control over most of the existing non-Wilderness, presently roadless areas, but may be by prescribed burning. The latter is dangerous if not preceded by a thinning harvest, and if dead, unconsumed timber is left following the burn, those downed and standing dead trees will and to the fuels, available and ready to burn, for decades, even a century or more, to come. We cannot set up our forests to experience severe wildfires such as we experienced in Yellowstone Park in 1988. These large, very hot fires are just to damaging to the soils and to the watersheds where soil erosion and stream course damage exceed anything normally experienced from proper forest harvest and management. (Individual, Evergreen, CO - #A19178.30400)

It appears that the current management of the forest involves a leave-alone policy in terms of downed and dead trees. The other strategy that appears to be applied is controlled burning. While nature allows for the forest to develop wildfires of all sizes as well as the development of insect and disease outbreaks, it seems that a policy of letting nature be nature in this case may not be entirely in the interests of the environment. Having experienced the ash fallout and smoke from the Yellowstone fire of the late 1980s while living in Billings, MT, and the recent bout of fires here in Southern Oregon, I must say that a significant amount of air pollution and carbon dioxide emissions are produced by these fires which can't be good for the environment, particularly the air quality. It seems that a controlled harvesting of downed and dead trees would be appropriate to manage the risk of out-of-control wild fires. This would have to be balanced with the need to prevent soil erosion, particularly on hillsides. (Individual, Klamath Falls, OR - #A6931.30500)

Harvest of forest products for fuel reduction and forest health is an option in many cases. Modern equipment can often remove high-risk material without roads. Few roads are needed to accommodate harvest today. Also, managing roadless areas to retain their roadless character does not preclude the use of managed fire or application of chemicals for insect control. (Individual, Cloquet, MN - #A8272.30100)

Maybe you'll just have to drop the idea of "roadless" as a primary "value" to be protected. As fuel loads are the primary factor in the intensity and spread of fire, the wood must be extracted in some manner. And HRV data literally screams "removal." There is no way to precipitate a natural fire when base fuel loads are profoundly unnatural. Again, Moose Fire.

It is my guess that once the Moose fire is controlled, the burned timber is going to be in the billion-board-foot range. That is a TERRIBLE waste, ten years of wood at the old ASQ, and 20 years worth at the latest, litigated and never-met ASQ. We no longer have the local mill capacity to absorb even a small part of that timber...we might get a third of it in two years IF the remaining sawmills converted fully over to that wood.

First, wood is often too heavy to be flown, and ground-based equipment is often the only economic option.

Second, ground based equipment such as forwarders are specifically designed to reduce soils compaction.

Third, many forests have a climactic interval called "winter." It is very possible to build ice roads such as on the North Slope for haulage. (Individual, Whitefish, MT - #A20672.30110)

TO RESTORE A NATURAL FIRE REGIME

The Forest Service should restore a more natural fire regime wherever possible and where necessary cut down ladder fuels (brush and small diameter trees) and allow decomposition. Roads are not necessary to accomplish these activities. (Organization, Auburn, CA - #A20801.30310)

Your studies have concluded that commercial logging (removal of larger trees) in over-dense stands actually INCREASES the risk of catastrophic fires and that the best way to deal with these areas is through cutting of the smallest trees and restoration of a natural fire regimen. (Individual, Roseville, CA - #A10567.30100)

TO ENSURE FIREFIGHTER SAFETY

I suspect it could be argued that the failure to selectively harvest the timber lands with controlled burning of slash piles and various forest debris could have contributed heavily to the exploding fire front which claimed the lives of my friends. (Individual, Kalispell, MT - #A8758.30550)

There is no guarantee that removing dead trees will prevent forest fires, But there is no doubt that responsible logging can greatly reduce the impact of wildfires.

Studies conducted by the forest service have shown that areas that have burned take 100 years longer to recover and become productive than areas that have been logged and restored as per government guidelines.

It seems to make a lot more sense to have someone pay to cut down the dead trees and use them to provide jobs and building material, than to pay someone to try to extinguish the same trees when they have become a wildfire and a threat to life and property.

There has been a rumor going around here that 4 firefighters lost their lives to save a sucker fish because of the stringent guidelines in the roadless rule. If this is in fact a true story, we are in a sorry state. People are more important than trees, fish, birds, or any "rare or old-growth species". (Individual, Centerfield, UT - #A12776.30320)

BY RMEOVING 24" TREES ON THE STUMP AND USING THE MONEY TO PAY FOR ROAD REPAIR

Have a forester go in and mark the trees to be cut. Cut only 24" on the stump and use the money to help pay for road repair—this will also help the fire access. Can also do this on military installations. (Individual, Normandy, TN - #A11315.30200)

BY REMOVING TIMBER LESS THAN 14 INCHES IN DIAMETER OR 50 YEARS OF AGE

Little if any mechanical treatment should be needed in most roadless areas, and then only to protect large overstory trees or to provide defensible burn perimeters. Any tree removal should be of younger, small-diameter trees, less than about 14 inches in diameter or 50 years of age, and they should be left on the site or burned in piles if necessary. The existing roadless rule gives local forest managers discretion, on a site-specific basis, to thin small-diameter trees where needed to restore ecological processes, provide habitat for endangered species, and avert catastrophic wildfire. (Organization, Seattle, WA - #A21694.30100)

BY REMOVING MATURE TREES BEFORE THEIR COMMERCIAL VALUE IS GONE, ACCOMPANIED BY CONTROLLED BURNING TO REDUCE FUEL

Healthy forests can exist in a climate of forest management, if older trees are removed before their commercial value is gone. Removal can be done by helicopter or nearby roads. Burning should be a forest management tool, that could be used following all lumber cutting to clear underbrush and trimmings, as well as prescribed burning on non-timber usable lands. Diseased and insect infested trees should be removed, either by burning or commercial timber removal which would be followed by burning of underbrush and tree trimmings. (Individual, Layton, UT - #A30536.30100)

Forest management includes harvesting mature timber that has commercial value before it reaches the dead and dying stage where removal is not cost effective. (Individual, Princeton, WV - #A18086.30200)

As a nation we are worried about global warming and air pollution. How can we justify letting millions of acres of a valuable resource go up in smoke? How can we justify spending billions of dollars fighting fires when we could have generated money from timber harvest? (Individual, Moyie Springs, ID - #A30047.30300)

BY REMOVING OLD GROWTH

As you know old growth timber should be harvested to be utilized and to prevent forest fires. (Individual, Buffalo, WY - #A15052.30520)

BY REMOVING EVERY SIXTY YEARS AND CLEARING UNDERBRUSH EVERY TWENTY YEARS

In regards to the management of roadless areas, we believe that careful harvesting and cutting is needed to ensure a healthy forest. A forest that is cut occasionally is actually healthier than one that is not harvested. This is because excess wood and brush build up, making it a prime target for a forest fire as seen in the west these past few years. If fire prevention techniques included clearing out the underbrush of a forest, they would not have become powder kegs of disaster.

Therefore, we believe that underbrush should be taken out every twenty years and cutting should be done every sixty years. (It takes approximately 60 years to grow a forest suitable for cutting). During these "cleanings," the wildlife should also be tested for disease and any foreign species (such as the gypsy moth) that is detrimental to the native flora and fauna. Also, current practices involving endangered species and damage to the ecosystem should be followed. In essence, we support that the land [should be] managed for the current goals of sustained yield and multiple usage. (Individual, Harrisonburg, VA - #A30138.30510)

BY ALLOWING SMALL SCALE TIMBER REMOVAL

The only logging I wish to see would be by small-scale family operations for the purpose of thinning and fire reduction, and disease control, with essentially no new roads. I would favor helicopter logging. Local forest planning can address these issues, with public input. (Individual, Manhattan, MT - #A671.90510)

If they are "declared" roadless, even though unofficial routes exist, they should be left open (depending on individual circumstances) for recreational use and fire suppression (within reason) but highly disruptive uses (such as logging) should be banned. The only exception to logging would be sales of SMALL trees (poles, firewood, etc.) on a small scale. This would probably do more good than harm. (Individual, Sandia Park, NM - #A26171.30100)

BY IDENTIFYING AND REMOVING TIMBER THAT CAN BE HARVESTED WITHOUT ENVIRONMENTAL HARM

For many years I have used the Flathead Forest for my primary recreation and feel that I am familiar with it. There is a lot of land that should never be roaded for various reasons. Much of it is too steep and too high to be suitable for timber production. But it seems that the land has been adequately protected by existing laws and regulations. There is no question that much of it is more valuable for recreation, watershed, wildlife, etc. But in our area, and I assume in others, there is land that was included in the original Roadless Inventory that was roadless for no other reason than that it was burned in the early 1900s and is just now maturing into merchantable timber. Even though it is difficult to do, an attempt should be made to identify these lands that can be logged without environmental harm. Typically, it is a dense lodgepole forest, of little use for much of anything, certainly a poor place for recreation or wildlife production. But it is an ideal site for a large, extremely hot fire. (Individual, Bigfork, MT - #A1079.45400)

Use sustainable and lower impact logging such as selective logging and the use of draft horses rather than machines. Encourage local, independent loggers if you want to reduce the fuel load. Kick the timber corporations out of our forests. (Individual, Bozeman, MT - #A27944.30520)

Remember, man is limited in his physical abilities and needs access to do his work. We now have low soil impact machines and new harvest systems, that can do the job. We have the technology, but we need the roads to be effective and safe. (Individual, Sula, MT - #A3022.30100)

BY EMPLOYING SUSTAINABLE TIMBER HARVESTING TECHNIQUES FOR FOREST HEALTH

If roadless areas have not previously been logged (which is generally the case), there should not be any significant fuel buildup. It is clearcutting that creates the undergrowth that builds up to hazardous fuels in the first place. If all national forest logging was done sustainably (i.e. selective removal with minimal to no road building rather than clearcutting) we would not have nearly the level of fire problem that we do at present. Private companies that have historically engaged in selective removal, leaving large as well as small trees behind, have had significantly less problem with wildfires than lands that have been clearcut. Insects and the diseases that they carry are similarly much less of a problem in a healthy forest since natural predators keep the insects in check. Clearcutting throws the ecosystem out of balance, destroying the habitat of some, but not all species, and leaving other species without any predation. This leads to problems with disease as well as overpopulation of particular species, such as some disease carrying insects. (Individual, Sunnyvale, CA - #A20760.30100)

WITH HELICOPTERS

The Forest Service must also modify the policy so that it adequately addresses the very real forest health crisis that threatens millions of acres of our National Forests. Careful but active forest management, guided at the local level, is the best way to ensure that these forests are truly protected for the long term. Some logging should be done in roadless areas to reduce the build-up of bark beetles and to harvest dead and dying trees. This will reduce the fuel build-up that could sustain a major forest fire. In roadless areas, the only way this can be accomplished is with helicopter logging. This is expensive and often results in a deficit sale. The expense of this type of logging is nothing compared to the expense of a major forest fire. Local forest level decisions, supported by accurate, site-specific information, are the best way to conserve national forests. (Association, Princeton, ID - #A27994.30100)

The Helicopter Logging sector provides an efficient and valuable means of harvesting timber, in addition to providing invaluable service in all aspects of Forest Management—especially in the ancillary Firefighting role, to which it finds itself applied every year. The availability of the firefighting services

we provide may be severely compromised if the foundation of our business is removed by the curtailment of timber harvesting operations. (Business, Juneau, AK - #A30599.30910)

If there is to be logging for bug kill, etc., the logging should be aerial. (Individual, Missoula, MT - #A6141.31223)

We strongly believe that we keep the option open to carry out forest health projects in roadless areas. In most cases this can be carried out economically with aerial work and leave the area roadless. In some areas the distance might be too far to a road or the values of the material you are removing so low the normal timber sale process will not pay for the work. This is the situation in which areas were ignored for too long and the fuel loading was allowed to build to the dangerous reels it is at today. In these cases the work can still be done by aerial means or prescribed fire, (very dangerous now), but the government will have to pay for the work with general funds rather than sale of products. This is too bad and did not have to happen, but often agencies like the USFS are led off their mission by political agendas. (Business, Portland, OR - #A10558.30100)

WITH HORSES

If wise forest management requires some logging due to fuel build up near homes, for instance, selective logging by horse teams creates jobs and minimizes negative impacts on area communities, wildlife, and forest users. It does not require creation of new roads, and is possible on steep land difficult and excessively expensive to build roads on. (Elected Official, Bozeman, MT - #A27736.30200)

1484. Public Concern: The Forest Service should reduce the basal area index of stands of trees.

TO MAKE TREES MORE RESISTANT TO INSECTS AND DISEASE

Roadless Proposal will significantly reduce USFS ability to restore Forest Ecosystems Health. Restoring forest ecosystem health can be accomplished by improving the resistance of trees to insect attack. This is accomplished by reducing the "basal area index" of stands of trees. Stands with the appropriate basal area index will have healthier trees enabling them to be more resistant to attack from endemic populations of beetles. Appropriate thinning of timber stands has the same effect as thinning carrots or apples. Thinning provides more sunlight, space, water and nutrients to those remaining, which allows these individual trees to be stronger, healthier and more resistant to insects and disease. Too many individuals in too close to each other weakens all of the individuals and creates conditions for rapid disease spread. Such is the condition of our forest ecosystems. Tree mortality from insect epidemics are rampant on most national forest in the west, particularly those in Utah. Elimination of fire and reduction in appropriate amounts of timber harvest have increased the amount of biomass by as mush as 25% in just the last 10-15 years. Options within this Roadless proposal to eliminate timber harvest as a management tool are not appropriate. It appears that national presidential political motives not scientific motives have singled out the timber industry and are attempting to eliminate it as a management tool for the USFS. (Professional Society, No Address - #A27584.30200)

1485. Public Concern: The Forest Service should allow clear cutting.

IN LESS THAN FIVE ACRE, WIDELY DISPERSED PARCELS

Any clearcutting should be in small, less than 5 acres, widely dispersed parcels. (Individual, Kalispell, MT - #A19138.30100)

1486. Public Concern: The Forest Service should allow salvage removal.

FOR FOREST HEALTH

Protecting forests: Forests are subject to largely unpredictable catastrophes in the form of windfall, fire, and insect attack. Management should have the flexibility to do prompt salvage when needed for fire

hazard abatement or prevention of spread of insect infestations, particularly in the vicinity of private or state lands or national forest land in other categories. (Individual, Olympia, WA - #A811.30100)

Furthermore, there should be direct provision for salvage harvest in any area where a fire occurs and salvage is feasible or in areas where insect damage has created a non-functioning forest environment and increased the danger of catastrophic wildfire. (Association, Murphy, ID - #A18024.31220)

Now after seeing the two months of raging infernos a recent poll shows almost 90% of the locals think the fire killed timber should be removed, even in the roadless areas, in order to reduce fuel loading for the future. Of course much of the fire could have been prevented if forest health programs had been carried out. So in summary, take charge of forest health and use all the tools you have at your disposal to take good care of our roadless areas. (Business, Portland, OR - #A10558.30100)

Another reason to continue logging in the Manti-LaSal National Forest is because millions of Engleman spruce pine trees have been killed by the "spruce beetle." It has been estimated that 350 million feet of Engleman spruce are dead. Carl Alsup, Operations Manager, at Satterwhite Log Homes, said "right now there is enough dead pine trees in the Manti LaSal National Forest to keep us in business for forty years." There is nothing to kill the beetle or prevent it from killing the pine-trees. The only solution is, two to three weeks of -20F or -30F degree weather. The beetle is continuing to spread north through the mountain range, causing devastating amounts of pine trees to die. Keeping the roads open will help the loggers get into areas where they can harvest the dead timber. Removing this dead timber will help allow for regrowth and get rid of the dead Engleman spruce pine trees. (Individual, Manti, UT - #A20336.31223)

AS SOON AS POSSIBLE AFTER A FIRE

In case of a wildfire in a National Forest, the Forest Service needs to expedite the sale of the dead and dying timber. In other words, allowing salvage operations to begin as soon as possible and no later than sixty days after the fire. The following spring, re-planting of the burned area needs to begin. (Individual, Kamiah, ID - #A5419.30400)

TO UTILIZE THE TIMBER BEFORE IT ROTS

The use of fire burned timber has not been fully utilized and needs to be sold for lumber before it rots and becomes useless. (Individual, Kalispell, MT - #A20334.31120)

I am writing to support a change in the Forest Service's Roadless Area Conservation Rule. Our forests are renewable resources, and should be used, not just "locked away" for the trees to die, the bugs to eat them, and fires to destroy untended and over-grown areas. Trees are a useful product. Old trees, dead trees, infected trees should be culled and selectively logged -- so they can be used, not wasted -- and new seedlings should be planted to allow regeneration and regrowth of this renewable and useable resource. (Individual, Kamas, UT - #A8901.30100)

TO THIN OLD GROWTH

I am deeply concerned that the ecological objectives of the Northwest Forest Plan will not be met if the current trend of decreased budgets and facility consolidations continues. There are millions of acres of second-growth forests within late successional and riparian reserves that, according to scientists at the PNW Research Station, will not develop the old-growth characteristics needed in these areas without being thinned.

In April 2001 . . . the PNW Research Station concluded:

"Future projections for young, dense forest stands in late successional reserves strongly suggests that they are not likely to develop late successional old-growth habitat or biodiversity conditions through passive management. Without active management, substantial stand-resetting events (fire, blowdown, insects) will likely be required to establish trajectories that lead to late successional old-growth habitat and biodiversity conditions." (Individual, No Address - #A2312.30100)

[The PNW Research station] has identified millions of acres within late successional reserves that are in need of thinning. He identified 152,000 acres on the Olympic National Forest, 122,000 acres on the Gifford Pinchot National Forest, 370,000 acres on the Shasta-Trinity National Forest, as well as 300,000 acres on the Siuslaw National Forest. (Individual, No Address - #A2312.30100)

WITHOUT CREATING NEW ROADS

I have no problem with some thinning where appropriate for new wildlife areas and to help the forest regain a healthy status after years of fire suppression. However, any thinning efforts must not create new roads. Where tree thinning is allowed, it is important to cut the small, weak trees and leave the larger healthy trees in the forest. A market may need to be created for less desirable wood—I can't believe it's not useful. (Individual, Silverthorne, CO - #A28101.30530)

WITH ENVIRONMENTALLY FRIENDLY TECHNIQUES

Inventoried roadless areas can be managed to provide for healthy forests by using the least intrusive management strategies available today. For example, thinning operations may be conducted in snowy seasons using rubber-tired tractors for skidding that not only leave no trace, but reduce fire loads and encourage a healthy mosaic of a diversity of tree species. Best of all, thinning in this way benefits the small operators in the tiny towns of the West and adds to a diverse, sustainable economy. (Individual, Pinedale, WY - #A26289.30530)

IN AREAS WHERE INSECT AND DISEASE OUTBREAKS WILL BE INTENSE

In Southeast Alaska, the issue of protection involves insect and disease damage that is endemic to this region. Occasionally there are localized outbreaks that are identified by the State and Private arm of the Forest Service in cooperation with the state extension service. In locations where outbreaks are or will become intense, access to them should be provided for salvage operations. Over the relatively long forest rotations contemplated for a cool climate forest such as the Tongass NF these proactive salvage operations will have an impact little different than areas of blowdown largely because the Tongass NF was largely formed by blowdown due to storm events. (Business, Seattle, WA - #A20468.31223)

1487. Public Concern: The Forest Service should allow selective timber harvest.

Forests need to be selectively harvested. Harvested areas provide barriers to fires that would otherwise spread at a rapid rate. Harvested areas provide a safe-haven for animals when fire occurs. (Individual, Aptos, CA - #A16303.30520)

As a forty plus year professional forester, I want to express my concerns with the attempt to create more roadless areas in the National forests.

First and foremost is the overwhelming need to address the forest health and fire risk issue on USFS lands. Anyone who views the National forest with an objective eye can see the dead, down and dying overstocked forests that have been created by decades of fire protection with no fuel management. This is an unnatural condition that has allowed shade tolerant species to overstock the eastside pine forests and severely overstock westside forests, and is leading to severe bug kill like the Spruce Budworm epidemic that is creating a fire trap on White Pass in the Gifford Pinchot Forest in Washington and most of Oregon's eastside forests.

The only answer to this problem is fuel removal through selective thinning that leaves the best most vigorous trees, followed by controlled burning to eliminate the slash and understory debris. This process can restore a healthy forest that can survive light burns, but to be economically feasible roads are necessary to carry out the thinning job. These roads can be blocked off for vehicle traffic for several years between thinning entries, but still available to fight fire, if necessary.

We have seen many examples of the USFS simply letting forests be destroyed by fire when no road access was available. This is a senseless waste of the forest resources, wildlife habitat and the economy of many Western State communities. (Association, Longview, WA - #A10556.30200)

TO KEEP FORESTS THINNED AND FIRE FREE

"I believe logging should be your first priority to keep forests properly thinned and fire free. (The proper phrase for the type of logging I am talking about is called, 'select logging,' not 'clear cutting.' It appears some who work for you don't know the difference). If you must have roadless areas (and frankly I don't see the need), loosen the laws to allow some roads to be built for a specific purpose and then remove them. This can be done without harming the environment." (Individual, No Address - #A834.30000)

TO REMOVE DEAD AND DYING TIMBER

There are thousands of acres in which SELECTIVE logging practices can be employed as a thinning process to clean up the dead and dying as well as small timber which can provide material for pulp and studs. Destruction of roads to establish a bogus wilderness is ludicrous.

Non-appealable sales for selective logging and cleanup of underbrush and small timber is all that will be needed. (Individual, Whitefish, MT - #A5102.30100)

Selective cutting of diseased or dying trees with chipping of slash should be practiced. (Individual, Kalispell, MT - #A19138.30100)

TO PROVIDE BARRIERS TO FIRES AND PROVIDE A SAFE HAVEN FOR WILDLIFE

The best way to maintain healthy roadless areas is by establishing roads—not establishing roadless areas! Roads become firebreaks, and allow emergency equipment to gain access. Forests need to be selectively harvested. Harvested areas provide barriers to fires that would otherwise spread at a rapid rate. Harvested areas provide a safe haven for animals when fire occurs. (Individual, Cottage Grove, OR - #A23450.30100)

1488. Public Concern: The Forest Service should thin fuels.

AS NECESSARY

Roadless areas should be thinned as necessary to prevent fires, or be allowed to burn when Mother Nature starts a fire - just be sure to build a large fire break around it. (Individual, Helena, MT - #A150.30400)

What about the wilderness and parks? In most, the trees are thick and there isn't much feed so the animals come down to the logged areas. The elk, deer, wolf, bear and lions will move—in that order so there aren't that many animals in the wilderness. If the logger moves into an area, the elk and deer move with them. When they get deep snow in West Yellowstone, the elk, deer, buffalo and antelope come into the town of Gardner, Montana. They lay under your window of the motel, cross the street and cars have to stop for them. They walk down the sidewalk and people walk around them. Then, in the spring just before calving, they all leave town. So, if they thinned all these wilderness areas, all animals would adjust and it would be better for the people and the animals. A good environmentalist is one who takes care of the trees by thinning as well as logging marketable trees. This allows for new growth for the next generation of trees. (Individual, Bonner, MT - #A958.30530)

RACR permits thinning of small diameter trees when this is truly necessary to restore forest health and ecosystem quality. Such thinning and removal can occur in roadless areas using horses or helicopters, if deemed ecologically advisable. (Individual, Macomb, IL - #A15592.30400)

TEN PERCENT EVERY TEN YEARS

Thinning of no more than 10% every 10 years is an acceptable practice for some areas where harvesting is desirable. (Individual, Olympia, WA - #A441.30530)

YEAR-ROUND

Forest thinning should be practiced intensively, year-round. Clinton ignored three (3) studies warning to reduce National Forest fire-load build-up . . . resulting in the terrible fires of 2000.

Build roads...thin timber . . . cull constantly . . . harvest with common sense . . . consult loggers, lumber industry. (Individual, Port Angeles, WA - #A652.30530)

THIN TREES AND BRUSH LESS THAN TEN INCHES IN DIAMETER

By thinning trees and brush < 10 inches in diameter. (Individual, Penn Valley, CA - #A12007.30510)

ALLOW RESTORATION THINNING PROGRAMS

In the Intermountain West and in the Pacific Northwest, what is needed are restoration thinning programs to restore abuses caused by "local decisions" to high grade and log old growth respectively. In the area of the Northwest Forest Plan the thinning of LSRs is only 15% of annual requirements. The time window on these thinnings is a decade or two at the most. Thinning and restoration programs would take many more local jobs. The logging companies, however, covet the big fat pumpkin old trees, and the local National Forests are glad to oblige. They cut the old trees, build more roads, same old ruin more views, damage more watersheds, deceive the public with buffer strips and on and on. You cut trees in roadless areas where I hike and destroy alpine vistas I love. I'm sick and tired of this sort of local "help" which destroys my national forests. Show me that you can do some real restoration work and preserve what is left in our inventoried roadless areas and unroaded areas. (Individual, Corvallis, OR - #A13493.30130)

PILE THE BRUSH AND BURN IN THE WINTER

Roadless areas should be thinned with the brush piled and burned in the winter after the snow. The areas that are set aside for no logging should be cleaned of brush and burned. (Individual, Forest Ranch, CA - #A5944.30531)

TO REDUCE UNNATURAL FUEL LOADS IN ROADED AREAS

So we've determined that clearcuts are out, and moist or high elevation forests don't need thinned. Therefore, it is critical to understand that the entire thinning argument must be confined to the drier ponderosa pine and Douglas fir forests. Now if there is one thing the Forest Service must have learned by now, it's that they can't manage wilderness. Decades of active management through fire suppression, logging, grazing, and road-building have produced the forest health crises Western politicians are so fond of speaking of. Therefore, the Forest Service must *stay out* of roadless areas so they don't destroy those too. I recognize that past mismanagement has produced "unnatural" fire regimes, but the impact is much more intense in roaded, logged, and heavily grazed areas near roads. Therefore, I support thinning to reduce unnatural fire loads, but only in roaded areas. Roadless, wild forests still have the most natural fire regimes in the forest and active management will only muck things up. New forest plans must allow natural fires to burn through wild forests in order to restore natural fire regimes and abandon their war-like attitude toward natural fires. (Individual, Pullman, WA - #A6234.30530)

Protecting Forests. The inventoried roadless areas should be managed with no additional roads allowed. Any timber harvest should use roadless methods only. Precommercial thinning should be encouraged as long as slash is disposed of, otherwise increased fuel loading will exacerbate the already critical situation. Prescribed fire should be utilized wherever it is safe to do so. (Individual, Salmon, ID - #A8830.30100)

Except perhaps for lightning fires, fires are more likely to begin in populated, developed, and disturbed areas. Fires don't usually cause devastating damage in roadless areas due to water retention of large trees, multi-layered canopies so fires don't often burn the tree crowns, and because there is no logging stash, further drying by herbicide spraying, or pioneer brush and conifer plantations in the area because roadless areas are quite undisturbed. Most of the very serious damage done to ancient forest/roadless areas by fire are due to firestorms which enter these areas from over-managed areas in the region. So, appropriate brush management and targeted trimming and thinning in the urban/wild interface is the key. Plans to thin currently roadless areas will INCREASE rather than decrease FIRE RISK in those areas and in adjacent areas!!! (Individual, Los Angeles, CA - #A17161.30430)

IF STUDIES INDICATE THINNING IS BENEFICIAL

Selective thinning of small diameter trees and brush may be appropriate in areas of high fuel buildup. Scientific studies are in process to see if this procedure is helpful. Widespread thinning should not take place until the results of scientific studies indicate that this is a beneficial process. (Individual, Gallatin Gateway, MT - #A19100.30530)

WITHIN A HALF MILE OF MAJOR DEVELOPED AREAS

Limited thinning of trees within a half mile of major developed areas might be acceptable, if the thinning is done to lower fire risks and not to provide logs for the timber industry. It's ridiculous to log generally throughout the forest to "protect" developed areas. That's simply another logging-oriented scam. Another major natural event which should be considered is protecting private property and streams from land and mud slides caused by logging activities, such as those which occurred in the Bitterroot last summer. That means keeping logging activity off steep hillsides, including such oxymorons as erosion preventing logging and other erosion causing activities. (Individual, Libby, MT - #A14047.30530)

IN THE URBAN INTERFACE AREA

The only forests that should be intensively managed (thinned) are those on the urban-natural fringe.

Only employ thinning on the boundary (within a mile or so) of private structures. (Individual, Hampton, VA - #A16453.30530)

IN WILDERNESS AREAS

After logging, the grass comes in and grows feed for the animals and a new crop of trees come up. But this only lasts for so many years. The new trees get so tall and shade the grass and then the grass dies. So the grass is gone. Then, the animals move to a new logged area. So everything goes hand in hand. Trees that grow up with space around them have branches from the ground up. Therefore, the tree has lots of taper. The trees that grow close enough together to shade the lower branches, the lower braches die. These trees have a lot less taper. If the wilderness were logged and thinned out, there would be better feed for the animals and it would be better hunting. And, there would be roads to care for the forest. (Individual, Bonner, MT - #A958.30100)

1489. Public Concern: The Forest Service should allow firewood collection.

TO REDUCE FUEL LOADS AND FIRE HAZARDS

Try to have firewood seekers remove the fallen trees first, reducing fuel for forest fires! (Individual, Laramie, WY - #A7315.30510)

Do not close existing roads!! Allow for private citizens to cut firewood! This helps keep fuel load down. (Individual, Fillmore, UT - #A11442.30510)

Firewood permits should be given free to the public in areas where dead trees pose wildfire dangers. Local convicts can cut firewood for the elderly and disabled. (Individual, Prairie City, OR - #A15474.30510)

And there should be more open options on firewood gathering of dead and/or fallen timber. This in itself would assist in the removal of wildfire ground fuel and would be of help in fighting forest fires. (Individual, No Address - #A29887.30510)

Species and spacing uses mechanical methods or prescribed fires to thin thick stands of less drought-tolerant, less insect-resistant species. Fire must only be used after thinning and reduced fuel loadings have created enough areas or strips across the landscape so that catastrophic fires are less likely. It is critical to prioritize species and spacing the fuel reduction work. Roadless areas represent the lowest of all priorities and least appropriate areas for this kind of work for many reasons. (Individual, Olympia, WA - #A20849.30500)

ALLOW FARMERS, RANCHERS, AND LOW-INCOME PEOPLE TO HARVEST, AT NO COST, DISEASED, DAMAGED, OR EXCESS TREES FOR FIREWOOD RATHER THAN USING CONTROLLED BURNING AS A FUEL REDUCTIONS TOOL

There must not be any more controlled burns. If the forest gets too thick, twice a year the Forest Service should go in and plainly mark all diseased, damaged or excess trees. This should be done when the snow melts and before it flies again. Farmers, ranchers and poor people should be allowed in to cut free firewood under the supervision of the Forest Service. Or the Forest Service should do it themselves. This will cost some money, but it's cheaper than fighting a huge conflagration. If you cut it and gave away free firewood that would promote good will. (Individual, San Diego, CA - #A1614.30000)

Management is the key to forest problems. Right now the Forest Service personnel are so busy doing paperwork they don't have time to go out and manage the Forest areas that need help. Look at the fires all over the West in the past several years. All that wood is burned up - it might have been used for something? My elderly neighbor who can't afford too much now can't get the wood she has gotten in the past because of restrictions in the Manti LaSal National Forest. (Individual, Spring City, UT - #A21137.30100)

1490. Public Concern: The Forest Service should allow hand removal of woody debris and small diameter understory trees.

Inventoried roadless areas should be managed using site-specific analysis. Fire and fuels treatment methods should be used that protect the roadless values while also reducing the fire hazard. Methods such as hand removal of woody debris, prescribed fire and preferably hand-removal (rather than mechanical) of small-diameter understory trees can be used on a site-specific basis to deal with both fire hazards (restoring a low-intensity fire regime) and forest health issues. (Individual, Pearblossom, CA - #A28121.30400)

1491. Public Concern: The Forest Service should create defensible fuel zones.

WITH PROFITABLE TIMBER SALES CONDUCTED WITH OVER-THE-SNOW EQUIPMENT

Break up the damned fuels! Sure, the interface fuels are first priority, but here on the FNF [Flathead National Forest], despite a request from the community, staff hasn't even begun scoping on a fuels management strategy for the forest. There are drainages out there with such severe fuel and disease vectors that heavy management MUST be started with an eye toward creating defensible fuel zones. If these zones can be created with profitable timber sales conducted with over-the-snow equipment, it should be done, and done yesterday. (Individual, Whitefish, MT - #A13242.30510)

Do Not Allow/Restrict Timber Removal

1492. Public Concern: The Forest Service should not use forest health as an excuse to remove timber.

DO NOT CLAIM HARVESTING IS NEEDED TO REDUCE INSECT INFESTATION

Insect infestation is not an excuse to log. Insect infestation tends to occur in forests that are not healthy. Forests that have been fragmented by roads, reduced by logging and weakened by grazing have less chance of combating an alien insect invasion. Healthy, intact forests are very resilient and generally do not have a problem with insects. (Individual, Sequim, WA - #A4527.31210)

DO NOT CLAIM HARVESTING IS NEEDED TO REDUCE FUEL BUILDUP AND UNDERGROWTH

Fire and insects are a natural part of the forest ecology. Insect and disease outbreaks have been increased as a result of past logging replaced by genetic monoculture. Forests are at their strongest when they are left alone. Forests that have been logged in the past often do have dense undergrowth which is prone to causing more intense fires. This is not 'hazardous fuels'. Instead it is the natural progression of forest ecology. Old growth forests are much more bug and fire resistant than second growth forests that have never been previously logged and therefore dense undergrowth should not be an issue. Clearly, this is a

public relations attempt to promote cutting the trees to save them. (Individual, No Address - #A6761.30100)

Another paradox: applying effective fire suppression/exclusion results in an increase in fuel hazards and potential fire severity, and a decrease in biological diversity and ecological integrity. The forests most in need of vegetation and fuels treatments to reduce fire hazards, insect and disease outbreaks, and restore biological diversity are not roadless areas, but rather, areas that have already been roaded and logged. Building roads allegedly for the purpose of "forest health restoration" or "fire hazard reduction" only makes sense if mechanical thinning as a tool for fire hazard reduction is highly controversial, scientifically unsubstantiated, and fundamentally experimental in nature. Unfortunately, it appears that mechanical thinning is becoming yet another euphemism for industrial-scale commercial logging-one of the prime management activities that degrade ecosystems and cause forest health/fire hazard problems.

In some instances, it has been demonstrated that commercial thinning treatments intended to reduce fire hazard have actually had the opposite effect. Although gross tonnage of fuels may have been reduced, there has been a net increase in hazardous fine fuels accumulating on the surface and available for burning-primarily logging debris or "slash." Also, changes in microclimate from tree removal serves to increase solar radiation and wind penetration, which in turn increases site flammability following thinning treatments. (Organization, Eugene, OR - #A21798.30500)

1493. Public Concern: The Forest Service should prohibit timber removal.

BECAUSE TIMBER REMOVAL INCREASES FIRE SEVERITY

Opponents will also claim that the roadless policy will impede the ability to control wildfires. The catastrophic and unnatural wildfires in the western states this past year were due primarily to a bad drought, past wildfire suppression activities, and past timber and grazing practices. Many scientific assessments have [blamed] commercial logging [for] an increase in wildfire intensity and severity. In a report to Congress, the Sierra Nevada Ecosystems Project stated, "timber harvesting through its effects on forest structure, local microclimate, and fuels accumulation has increased fire severity more than any other recent human activity". The ecosystems of the roadless areas are more resistant to catastrophic and unnatural wildfires than the intensely managed and altered ecosystems of roaded areas. (Individual, Pittsburgh, PA - #A5752.30430)

The new scam about needing roads and logging to protect the world from forest fires is simply another deception cleverly contrived by Forest Service policy makers. It's obviously designed to justify logging and road-building where it should not be, just as the pine beetle and other insects have been your blank check for massive mayhem over the past 3 decades.

Once again, let me be clear: logging is logging. It's not fire prevention. STAY OUT OF ALL ROADLESS AREAS, PERIOD. In fact, many existing roads should be obliterated, allowing increases in the size of appropriate and justifiable roadless areas. That would be fair. (Individual, Libby, MT - #A8346.30100)

Conservation and taxpayer groups have urged the Forest Service and policy makers to adopt the following recommendations:. . . Prohibit the use of commercial timber sales for hazardous fuels reduction projects. Commercial logging removes the most ecologically valuable, fire-resistant trees, yet leaves behind highly flammable small trees, brush, and logging debris. The financial incentives for abusive logging under the guise of "thinning" must be eliminated; (Organization, Portland, OR - #A12004.30400)

PROHIBIT COMMERCIAL TIMBER REMOVAL

Prohibit the use of commercial timber sales for hazardous fuels reduction projects. Commercial logging removes the most ecologically valuable, fire-resistant trees, yet leaves behind highly flammable small trees, brush, and logging debris. The financial incentives for abusive logging under the guise of "thinning" must be eliminated. (Organization, Santa Fe, NM - #A22092.30520)

1494. Public Concern: The Forest Service should prohibit even age management.

Lower canopy fires are necessary for a productive forest: hazardous fuels do need to be dealt with in a responsible manner, this means no clearcutting or cutting resembling clearcutting in any way. (Individual, Akron, OH - #A17697.30100)

BECAUSE IT INCREASES WILDFIRE RISK

The primary argument against protection of roadless areas is threat of wildfire, and hence the need for logging to reduce wildfire risk. However, it's important to dissect this argument. First, clearcutting greatly enhances wildfire risk. Clearcutting removes the largest and most fire resistant trees, increases wind and solar radiation by removal of canopy, disturbs soil moisture holding capacity, leaves highly flammable layers of slash on sun-baked forest floors, disturbs the genetic, age, and species structure of the forest, and guarantees a monoculture future of young, dense, skinny trees. So clearcutting is obviously out, and we must be talking exclusively about thinning. (Individual, Pullman, WA - #A6234.30400)

First, no massive clearcuts. Such destructive logging practices make forests especially vulnerable to wildfires (clearcuts burn very hot) and disease by upsetting what had been a dynamic, healthy, balanced ecosystem. Do not let timber corporations do the job of forest "management", because environmentally-destructive, industrial-strength logging. (Individual, Bozeman, MT - #A27944.30100)

BECAUSE THE BROKEN MOSAIC BOUNDARIES OF CLEAR CUTS INCREASE THE MORTALITY OF BENEFICIAL SPECIES AND ALLOW INSECT ENCROACHMENT ON SURROUNDING AREAS

Broken mosaic boundaries of logging clearcuts increases mortality of all beneficial species and allows insect infestation to encroach on the surrounding forested boundaries. (Individual, Nampa, ID - #A5378.31200)

1495. Public Concern: The Forest Service should prohibit salvage removal.

As far as authorizing "emergency" salvage sales to control insect and disease outbreaks, or for storm damage, I am totally opposed to these actions! (Individual, Clemson, SC - #A26858.30100)

Nor should there be logging by any method to fight fires or to detect or prevent insect or disease outbreaks. Nor should there be salvage logging after a fire; salvage logging exacerbates the damage done by a fire. (Individual, Salem, OR - #A13948.30100)

The practice of salvage logging is highly controversial and cannot be scientifically justified. "The value of salvage sales as ecology therapy is extremely questionable. By removing most of the coarse organic debris from the site, salvage sales actually abort natural healing processes, instead of aiding them." (Jeffrey St. Clair 1991) IN 1976 Congress created a revolving fund for salvage sales as part of the National Forest Management Act. The Forest Service can funnel all of the receipts from salvage sales back into the salvage sale fund where it can be used to design and build roads, and prepare and administer new salvage sales. Of course the agency is also permitted to keep a large slice for overhead, often totaling nearly 50 percent of the sale's bid value. Since the Forest Service can keep 100 percent of the receipts of salvage sales, almost all sales are by definition below-cost." (Jeffrey St. Clair) "Salvage sales often cost more than the revenues they can generate, because the sales are net cash generators, because one hundred percent of the receipts are deposited in the fund for preparing and administering future salvage sales," (Congressional Research Service, 1994) "Management activities that reinforce negative effects or undermine positive effects of fires must be avoided if streams are to recover. In particular management activities that add to the risk of increased sedimentation or that remove ecologically important large wood from the watershed present a substantial and long-term threat to the recovery of streams. In this regard, logging and roadbuilding represent one of the most significant forces threatening to retard streams and watershed recovery." (Letter from five ecology professors to President Clinton on post-fire salvage logging). "The extent of a forest fire depends more upon the moisture content of live and dead fuel at the moment of ignition than it does on the amount of fuel accumulating on the forest floor. Wind speed also plays a critical role. In fact, three of the biggest fires of 1994, Tyee,

Boise River and Blackwell, burned hottest and fastest in previously logged areas." (Ron Mitchell, Idaho Sporting Congress, 1995) (Individual, Roanoke, VA - #A23081.30100)

Fire is also an integral part of the forest ecosystem; it is the Forest Service's long-term policy of fire suppression has resulted in forests with uncharacteristic fire potential. Fires in roadless areas must be allowed to burn to prevent catastrophic fires in the future. While portrayed as a means of preventing fire, logging an area actually increases the likelihood of higher intensity fire I that area. Logging cannot mimic fire because it is a fundamentally different process than fire. In addition, in terms of ecological destruction, logging has more severe and long-lasting deleterious effects on soils than fire; this in turn leads to adverse impacts on aquatic habitat and the forest ecosystem as a whole. This is particularly true of "salvage logging" on previously burned areas. Logging and road construction in roadless areas will not prevent these and other areas from burning, but it will certainly eliminate roadless areas as anchors and refugia for fish and wildlife. Similarly, salvage logging will not prevent additional future fire and only exacerbates the impacts from fire, impeding the forest's ability to heal. Salvage logging or any post fire fuel reduction should not be allowed should a fire occur in a roadless area. (Executive Director, Inter-Tribal Fish Commission, Portland, OR - #A20331.30300)

The Bitterroot National Forest has recently claimed that their risky and unproven post-fire salvage logging proposal in burned areas there will reduce the risk of future wildfires - while at the same time the Forest Service talks about the need to restore fire into these fire-dependant forests. Numerous scientific studies have found that post-fire salvage logging hinders a forest's natural recovery process and has no ecological benefits. For example, a recent scientific report, "Wildfire and Salvage Logging," states that while "there is little reason to believe that post-fire salvage logging has any positive ecological benefits? there is considerable evidence that persistent, significant adverse environmental impacts are likely to result from salvage logging."

Furthermore, science does not support the Forest Service's claim that post-fire logging will reduce the possibility of a reburn. A 2000 Forest Service report found "no studies documenting a reduction in fire intensity in a stand that had previously burned and then been logged." (Individual, Staunton, VA - #A30027.31100)

1496. Public Concern: The Forest Service should prohibit thinning.

IN MOIST OR HIGH ELEVATION FIR, HEMLOCK, SPRUCE, AND CEDAR FORESTS

Now, thinning is needed to counteract nearly a century of fire suppression conducted by the Forest Service. However, 100 years without fire is well within the natural range of variability for moist or high elevation fir, hemlock, spruce, and cedar forests. These moister forests are actually adapted to high intensity fires. Due to their high moisture levels, these forests only burn during seasons of great drought, which of course produce catastrophic wildfires. Thus, Forest Service fire suppression over the past several decades has likely had little impact on these moist forests so thinning is not necessary. (Individual, Pullman, WA - #A6234.30530)

BECAUSE THINNING TO REDUCE OVERGROWN FORESTS IS COST PROHIBITIVE

The subject of "Forest Health" can fill volumes. Most thoughtful people who have taken the time to ascertain the condition of the forests in the Southwest Region conclude that the forest is generally overgrown, prone to cataclysmic fire events, and unhealthy. The trees in the LNF are especially stressed due to the overgrown condition. Excessive mortality of trees due to bark beetle attacks and mistletoe incidence are the rule rather than the exception. The question then arises as to what to do to improve the health of the forest?

Thinning is cost prohibitive. Estimated costs often exceed $1000 per acre. (Individual, Ruidoso, NM - #A17775.30100)

BECAUSE SILVICULTURAL ACTIVITIES DO MORE HARM THAN GOOD

Silvicultural activities will do more harm than good and are an excuse to high-grade these forests, making them more fire prone. Removing brush and small diameter trees is a money-losing proposition

and will create a higher fuel load in slash and brush re-growth from increased sunlight. The fire integrity of the forests will decrease even further if high-grading is done to pay for the removal of the low-grade, high fuel load materials. This integrity will be further compromised by the continuing maintenance costs once silvicultural activities are started and the fact that ten to twenty or so years from now when future maintenance is required there will be even fewer trees and even more brush and dog-hair, an even higher cost proposition to deal with. Just as with the $10B road maintenance backlog, a similar and larger backlog will develop in maintaining these forests in a "low-fuel-load state". This whole situation is a tar baby that once started will be rued and paid for by future generations. (Individual, Corvallis, OR - #A8027.30100)

BECAUSE ROADLESS AREAS SHOULD NOT BE DISTURBED

As the original rule stands, roadbuilding for fire control and forest health is allowed, which is reasonable in case of emergencies. However, the best management of roadless areas, in response to question three, is to leave them roadless and not disturb them, even for seemingly good things such as "forest thinning" for "fuel reduction" or insect control. (Individual, Bethesda, MD - #A16909.30100)

Fire Management

Summary

General Comments – A number of people comment on the topic of fire management and believe that it should be addressed in a national roadless rule. Several respondents urge the Forest Service to address fire management relative to the national fire plan, the interagency fire policy, and the federal/state strategy. One individual suggests that the Forest Service review the recommendations of the General Accounting Office on reducing wildfire threats and take immediate action. Additionally, one association requests the Forest Service consider that national grasslands are also at risk of fire.

Others suggest the Forest Service implement various fire policies such as the 1995 Wildland fire policy, the national fire strategy, and the national fire plan. Several respondents add that the Forest Service should change traditional Smokey the Bear fire suppression policies. Others request that the Forest Service work with other public land management agencies—including the National Park Service and the Bureau of Land Management—to set sound, consistent policies for fire management.

Adequacy of Analysis – Respondents comment about the analysis of fuel management, and the impacts and risks of wildfire. People ask the Forest Service specifically to consider that roadless areas do not have a higher risk of wildfire; that there is no causal link between uncontrolled wildfires and the presence or absence of roads; that the majority of roadless areas are not situated in areas of high fire risk; and that fire frequency increases as road density increases. One individual asserts that the Forest Service should conduct more studies about how to control fires, including controlled burns. Others ask the Forest Service to consider various contributing factors to fire severity and intensity such as human activity, wind, weather, slash piles, and tree species.

One individual requests that firefighting practices be evaluated. Others request that the Forest Service analyze the appropriateness and need for prescribed fire, the effectiveness of restoration projects, and the need for effective vegetation management on the national grasslands. Additionally, people ask the Forest Service to evaluate the impacts of no management versus the impacts of roading or other management activities; to conduct ecological assessments for all fuel reduction projects; and to categorize inventoried roadless areas in accordance with fire regime, condition class, vegetation, and risk of disease.

Funding – Several respondents believe the Forest Service should reevaluate the costs and funding associated with fire management. Suggested costs and funding to be analyzed include fire suppression costs, controlled burning funds, and firefighting funds. A few people assert that tax dollars should not be used to fund firefighters and their equipment that are brought in from distant places rather than the local area, or for fire suppression and timber removal in remote areas located far from residents. One business remarks that the Forest Service contract with an independent organization to analyze expenses associated with fire management if roads are destroyed. At the same time, an individual suggests the Forest Service provide funding to conduct controlled burns and non-commercial thinning, and ensure that emergency funds are spent in areas where wildfire truly threatens communities. Finally, one individual recommends that the Forest Service take legal action against organizations which have blocked fuel load removal in order to recover costs for fires that have resulted from such lack of action.

Education – Several people suggest that the Forest Service educate the public about fire safety; about the reasons for controlled burning; about the role of fire and disturbance in forests; and about what is needed to support firefighting efforts.

Management – A number of respondents assert that the Forest Service should actively manage forest resources to prevent fires and reduce fire hazards. To that end, people suggest a number of fire management strategies, including monitoring and grazing. One county commissioner suggests that the Forest Service should control fire size and frequency on public lands to approximately that of pre-settlement conditions by reducing fuel loads. Reducing fuel loads, numerous people suggest, can be accomplished through prescribed and controlled burning—in areas outside of wilderness or roadless areas, in forests which border communities, in late fall, every four to five years, or at low-risk times of the year. Some recommend carrying out prescribed burns only after preventative steps to reduce fuel loads are taken, such as harvesting, thinning, and grazing; and using techniques that adhere to local fire management plans and that contain monitoring provisions to assess the usefulness of the burns.

Others request that the Forest Service construct firebreaks—by using roads as firebreaks; by decommissioning some roads and managing the remaining as a defensible perimeter against wildland fire; by clearing dead timber and thinning stands next to private property to an appropriate width; by creating a boundary around roadless areas with multiple use, motorized trails; or by maintaining fire lanes but closing them to all but foot traffic. One special use permit holder suggests allowing ski areas located on the fringes of roadless areas to help provide defense zones which allow for development while decreasing fuel loads. Others recommend maintaining existing fire trails.

Some people also assert that the Forest Service should suppress forest fires. One individual states, “Protecting forests is something you know nothing about, or the let burn policy in Yellowstone would never have been followed. First put fires out as soon as possible before they get out of control.” Suggestions for suppressing forest fires include using chemicals, allowing fires to burn to a certain landscape feature before suppressing them, and enlisting military aircraft converted into water tankers. Some say the Forest Service should concentrate firefighting efforts in urban interface areas because these areas are already roaded and pose the greatest threat to life and personal property (see also the subsequent main section on protecting communities). Finally, some recommend that the Forest Service specify the criteria under which the Roadless Area Conservation Rule exceptions would apply for management activities needed to reduce the threat of wildfire.

Others assert that the Forest Service should acknowledge that wildfire is a component of a healthy forest. These people state that fires should not be suppressed—because natural fire maintains diverse forests and wildlife habitat; because fire rejuvenates ecosystems; because firefighting is a waste of money, dangerous, and harms the environment; and because dead timber is a critical part of the forest ecosystem. These respondents say that fires should only be suppressed under certain conditions—in the event of insect or disease infestation that is uncontrollable by natural means, or in the event the fire is human-induced.

Others believe that fire should be reintroduced into forest ecosystems. According to one organization, "The most effective fuels treatment that would both protect roadless areas from future severe fires [and] insect and disease outbreaks while at the same time [restore] areas altered by past fire exclusion would be a program of prescribed burning and wildland fire use. Fire reintroduction has been the longstanding call among scientists, ecologists, and conservationists. It is the most ecologically beneficial and least economically costly management treatment to manage roadless areas." A few people request that the Forest Service avoid artificial fires, backburning, and prescribed burning. Finally, one individual urges the Forest Service to allow a categorical exemption for restoring burned areas, including needed road building, salvage logging, soil preparation, seeding, planting, riparian restoration, and follow-up work to help the survival of seedlings.

Fire Management General

1497. Public Concern: The Forest Service should address fire management.

BECAUSE FIRE IMPACTS REGIONS DIFFERENTLY

The effect of fire on the inventoried roadless areas as stated on page 3-41 of the DEIS, overlooked the fire patterns in the various physiographic regions. As a result of this variation, forest fires disproportionately impact the intermountain and eastern Oregon lands more than other areas. In eastern Oregon these fires have had catastrophic environmental impact on the roadless areas. Any roadless policy needs to address fire management. (Elected Official, Roseburg, OR - #A17667.30400)

1498. Public Concern: The Forest Service should address fire management in a national roadless rule.

RELATIVE TO THE NATIONAL FIRE PROGRAM

The DEIS (3-12) also noted that under the proposed action an increase in fire suppression costs will occur as a result of increase in fire size and frequency. With the history of major catastrophic fires in eastern Oregon associated with roadless, natural areas, and the Wilderness areas, it is our position that the proposed roadless management strategy is not well advised. If it is adopted, then we strongly recommend that clear direction be incorporated relative to fire response activities and the national fire program. (Elected Official, Roseburg, OR - #A11811.30410)

RELATIVE TO THE FEDERAL INTERAGENCY WILDLAND FIRE POLICY, THE NATIONAL FIRE PLAN, AND THE 10-YEAR FEDERAL/STATE STRATEGY TO ADDRESS FOREST ECOSYSTEM HEALTH

This is a question that should be answered through planning at the forest level, but with some guiding principles at the national level. These guiding principles can easily be gleaned from the federal interagency wildland fire policy, the National Fire Plan, and the 10-year federal/state strategy to address forest ecosystem health in the West. Human intervention to minimize wildfire risk should be prioritized at the urban/wildland interface, but not at the expense of ignoring threats to private property from wildfires in roadless areas. Considering fuel buffers between roadless areas and private property is appropriate, but such strategies should be developed at the local level. (Association, Washington, DC - #A17887.30100)

Regarding protection from the buildup of hazardous fuels and severe wildfires, the Forest Service should continue to implement the National Fire Plan (NFP) and periodically evaluate and adjust the plan. The NFP contains a comprehensive 10-year strategy that includes fire fighting, rehabilitation and restoration, hazardous fuels reduction, community assistance, research, and accountability. The Forest Service has made addressing wildland fire in the urban-wildland interface a priority and this should continue. (Federal Agency, Washington, DC - #A28843.30410)

BECAUSE THE EFFECT OF FIRE VARIES BY AREA

The effect of fire on the inventoried roadless areas as stated on page 3-41 of the DEIS, overlooked the fire patterns in the various physiographic regions. As a result of this variation, forest fires disproportionately impact the intermountain and eastern Oregon lands more than other areas. In eastern Oregon these fires have had catastrophic environmental impact on the roadless areas. Any roadless policy needs to address fire management. (Elected Official, Roseburg, OR - #A11811.30400)

Management of healthy forests can occur without roads -- by definition that has historically been the case in the proposed areas. Fire management is complex and very situation dependent. Making a blanket statement on how to protect resource values and homes from wildfire is not possible. Clearly, local managers will need to retain some ability to make decisions based on resource values, knowledge of current fire ecology, location of private property, fire crew and public safety, weather, and a host of other factors, but this flexibility is included in the proposed initiative. (Individual, Seattle, WA - #A17843.30100)

1499. Public Concern: The Forest Service should review the recommendations of the General Accounting Office on reducing wildfire threats and take immediate action.

I believe that the recommendations of the GAO [general accounting office] on Reducing Wildfire Threats should be reviewed and actions immediately taken in the interest of protecting lands. Fire suppression has not worked and has backfired with devastating consequences. Taxpayers for Common Sense also published From the Ashes noting that untouched forests have the greatest resiliency and harvests promote fires. (Individual, Olympia, WA - #A20844.30400)

1500. Public Concern: The Forest Service should consider that national grasslands are also at risk for fire danger.

BECAUSE FIRES THREATEN HOMES, RANGE IMPROVEMENTS, OIL AND GAS STRUCTURES, VEGETATION AND WILDLIFE HABITAT, AND OUTLYING FARM AND RANCH STRUCTURES

The agency myopia regarding fire on the National Grasslands is also confirmed in the Roadless Administrative Record. There the Forest Service rates the National Grasslands as low for fire risk, although more than 60,000 acres burned in less than two days. The fire damage risk is greater in North Dakota, because there are many homes, range improvements, and oil and gas structures also located on the National Grasslands. A fire will not just burn vegetation and wildlife habitat, but could ignite oil pipelines, burn homes and outlying farm and ranch structures, and range improvements. (Organization, Denver, CO - #A21358.30400)

1501. Public Concern: The Forest Service should prohibit fires in dry areas.

Local forester input would be very useful on this subject, prohibitions should be established that would best protect depending on the potential risk of damage to a particular area, i.e. no fishing in endangered species areas, fire bans in dry areas, no bikes in erosion prone areas, etc. (Individual, No Address - #A8998.90000)

BAN OUTDOOR BURNING WHEN THERE IS A LACK OF MOISTURE

We think outdoor burning, such as county fire bans, should be enforced earlier when there is lack of moisture. (Individual, Bayfield, CO - #A13395.30400)

1502. Public Concern: The Forest Service should consider that the Roadless Area Conservation Rule will not likely result in an increase of wildfires in California.

IN ADDITION, CONTINUED IMPLEMENTATION OF THE NATIONAL FIRE PLAN AND THE CALIFORNIA FIRE PLAN WILL INCREASE PROTECTION OF FORESTS AND COMMUNITIES

Protecting forests and communities—CDF knows these two goals as interconnected. The Rule as adopted on January 12, 2001 provides adequate authority for CDF and the USFS to take the steps necessary to protect forests, communities, and public safety from wildfire and other natural disasters. CDF is pleased that the Rule responded to our concerns in this area, especially by creating flexibility for the Forest Service to construct new fire roads and reduce fuels with tree removal and other means when needed (see Section 294.12(b)(1) and Section 294.13(b)(1)(ii)).

CDF's experience has shown that more than 90% of wildfires are caused from human ignitions. Therefore, the Rule will not likely result in an increase of wildfires in California. In addition, continued implementation of the National Fire Plan, in conjunction with the California Fire Plan, will increase protection of both forests and communities, especially those in the urban-wild land interface. (State Agency, Sacramento, CA - #A18110.30400)

Fire Management General – Management Strategies

1503. Public Concern: The Forest Service should implement various fire policies and plans.

IMPLEMENT THE 1995 WILDLANDS FIRE POLICY

Issue #A1, The 1995 Wildlands Fire Policy is being Ignored. I repeatedly read about and have seen in the field first hand, our non-function natural processes that have resulted from aggressive wildfire suppression efforts over the last 40 years. I am reminded of this issue by the tragic accident that occurred on the Thirtymile Fire. In our area of the Northern Rockies, we are located in a fire adapted ecosystem where fire performs beneficial ecological functions. In spite of this, we aggressively suppress all fires, in all places, under all conditions.

We spend billions of dollars and put people in harms way each year for what reason? What are we trying to protect? There are a few times when we should proceed with initial attack on a fire start. There are many, many more times when we should allow fire to assume its natural role and monitor its behavior. In spite of the 1995 Federal Wildlands Fire Policy, such an evaluation and fire planning prior to initial attack is never occurring. I am certainly not advocating a 'let burn' policy, but true proactive fire management.

Any ecologist can clearly show why all wildland fire is not bad. Certainly we do not wish to see public inholding structures damaged by fire. We know there are very effective ways to treat nearby such structures in the defensible zone to reduce risk.

The fire organization has evolved over the years to take on a culture of their own. Many do not work well with or listen to other resource specialist's needs. You ask a fire manager if it was a bad fire year, and their reaction might be 'yes it was bad, there were no big project fires.' Too much emphasis is placed on the fire excitement and overtime, and not enough on what is best for the firefighter's safety, or the resource needs.

I know this is a very sensitive issue. The recent tragic deaths of four young firefighters in Washington State is terrible. As you know, much has been written in the media about firefighter experience and tactics related to this incident. The media is playing the blame game.

I read all the related articles hoping to find the real questions asked and answered. Only now, have these questions been asked. It is unfortunate that the questions (see the Portland, Oregonian article enclosed) were asked by Andy Stahl representing FSEEE. It is too bad these questions were not asked by the USFS. For what reason were these firefighters in that location and what were they attempting to protect? What in the area was so valuable as to justify risking human lives to protect it?

National direction is desperately needed now!! (Individual, Grangeville, ID - #A1578.30410)

IMPLEMENT THE NATIONAL FIRE STRATEGY

The Forest Service under the Bush Administration should maintain the roadless rule as written. Hopefully this administration will focus its attention upon implementing the National Fire Strategy and protecting human communities in the urban/wildland intermix in the American West. Reducing forest fuels and restoring forested landscapes for future generations is critically important to the American people and to the credibility of the Forest Service. It is not the time to be fighting over logging roadless land such as the Tongass or in California but a time to work collaboratively on solving the wildfire risks to our national forests and communities. We urge you to support the Roadless Area Conservation Rule and protect these pristine areas as roadless. (Organization, Placerville, CA - #A22653.10150)

IMPLEMENT THE NATIONAL FIRE PLAN

Full implementation of the National Fire Plan must be the land management direction for the next ten years on national forests. Until the hazardous fuel conditions are adequately corrected through various fuel reduction or forest restoration projects, no further restrictions should be imposed on management practices or access to any national forest lands. Every effort must be made to work with communities and adjoining property owners to resolve the hazardous fuel problem in the shortest and most efficient time period possible. (Professional Society, Chico, CA - #A29719.30410)

Only through the implementation of a National Fire Plan through cooperative efforts like the County Fire Safe Councils, will hazardous fuel get reduced across the total landscape and watershed of the west. (Professional Society, Chico, CA - #A29719.30410)

Building upon these thoughts, the success of the National Fire Plan provides an exemplary framework for roadless area value management to be based upon. There is not another issue that exemplifies this "working together" ethic that is vital and necessary for development of a successful roadless policy. Most recently the Ten-Year Strategy on how to address catastrophic wildfire threats across the country was signed by two cabinet secretaries and leading western governors. The CWSF [Council of Western State Foresters] feels that the Forest Service should seriously consider collaborating with stakeholders at local, state and national levels according to the process developed and recommended within the Ten-Year Strategy. (Professional Society, No Address - #A29920.30410)

1504. Public Concern: The Forest Service should change traditional Smokey the Bear fire suppression policies.

TO SOLVE WILDFIRE PROBLEMS

The Roadless Rule is based on scientific information that roadless areas are in fact the most resistant to severe wildfires, insects and diseases. Changing the Forest's traditional Smokey-the-Bear fires suppression policies will do more to solve severe wildfire problems than any other option. (Individual, Reno, NV - #A5741.30100)

The reason that we have fuel loading problems today is that we have been suppressing fires for a century, allowing unnatural fuel buildups to occur. This has led to a dramatic increase in large and intense wildfires throughout the nation, a fact that has been well documented in a series of Congressional Research Service reports. There is a saying in Wyoming: when you find yourself in a hole, stop digging! A hundred years of Smokey the Bear got us into this mess; no amount of fire suppression will ever get us out. Instead, we need to implement a nationwide let-burn policy in all of our roadless areas, to allow natural cycles of small, low-intensity fires to return on our forests. (Individual, Laramie, WY - #A10590.30310)

Forests are dynamic entities not static objects, hence they can be managed by never preserved. Overcoming the impact of 100 years of Smoky Bear fire control is not only desirable, but also necessary. VERY careful and limited controlled burning has a place and so does road building and logging. Stands to remain unlogged must be placed in a condition where natural ignition can be permitted without undue

risk of catastrophic wildfire . . . No one said it would be easy. (Individual, Ellensburg, WA - #A17772.30100)

Much of the controversy surrounding management of national forest resulted from aggressive clear-cutting practices, the road building associated with those activities and Smokey the Bear fire policy that has promoted a fuel buildup that can lead to catastrophic fire. The Idaho Outfitters and Guides Association strongly recommends reconsideration of those practices and that they not be executed in remaining roadless areas unless essential for forest health. Where large tracts of trees have been destroyed by disease or weather, the agency should have flexibility to reduce fuel loads, if necessary, in these areas if the prevailing conditions present a significant threat to the ecosystem and/or surrounding communities. (Permit Holder, Boise, ID - #A29589.30100)

Inventoried roadless should be managed to protect its roadless characteristics, which includes keeping motorized vehicles and pioneered roads out. Whether or not unroaded areas are inventoried, severe forest fires happen. They happen in roaded areas too. The build-up of hazardous fuels can be addressed by changing the failed fire suppression policies. Prescribed fire, though very limited in practical use, is a desirable option. We have fire management policies in wilderness that when applied, work quite well. We have inventory and control programs for insects and disease in wilderness. Use those same policies in inventoried roadless. (Organization, Helena, MT - #A20598.30100)

1505. Public Concern: The Forest Service should specify, to the extent possible, the roadless areas in which fire reduction management exceptions would apply.

IN THE FOREST PLAN REVISION PROCESS

The current roadless area conservation rule allows for management activities to reduce threats from wildfires.

We suggest that it is the role of Forest Plan revision to specify-to the extent possible-in which roadless areas this exception would apply and the thresholds that would trigger these management activities. It would be expected that these thresholds would be different for various land units identified within GIS analyses. (Civic Group, Roanoke, VA - #A1713.30400)

Regarding the management of inventoried roadless areas to provide for the detection and prevention of insect and disease outbreaks, the Forest Service should make clear that insects and diseases are part of a healthy forest. We note the exceptions of exotic and non-native species such as the gypsy moth and believe that provisions can be made for the well-justified control of these invaders. There are also periodic epidemics of native insect and diseases that may warrant control measures. The efficacy of carious pest and disease control methods should be established through research, reviewed for environmental impacts, and implemented using integrated pest management protocols on a case-by-case basis, with periodic review and evaluation. The role of insects and diseases in a natural forest ecosystem should include an assessment conducted in the early stages of plan revision or included as part of the Analysis of Management Situation of a revised plan.

The current roadless area conservation rule allows for management of insect and diseases under certain conditions. We recommend that it is the role of the Rule to determine the minimum standards which would be applied, and the role of the forest plan revision to specify, to the extent possible, in which roadless areas these exceptions would apply and the thresholds that would trigger these management activities. (Individual, Asheville, NC - #A22623.31200)

Carefully define specific national criteria for consideration of any exception in the designated areas for how management requiring roads can occur for fire, wildlife, fish, forest health, and any other legitimate need. (Individual, Galloway, OH - #A8213.30200)

1506. Public Concern: The Forest Service should work with all federal agencies, including the National Park Service and the Bureau of Land Management, to set sound and consistent policies for fire management.

IN NATIONAL PARKS, WILDERNESS AREAS, AND ROADLESS AREAS

A complaint of logging industries is that leaving tracts of land roadless leads to the possibility of destructive wildfires. However, fire is a natural element that ensures the health of forest ecosystems. Exceptions include situations where fire puts pressure on endangered species that are already under great stress from man's activities. All Federal agencies including the National Park Service, the BLM, and the USDA Forest Service should work together to set sound and consistent policies for fire management in National Parks, Wilderness Areas, and the Roadless Areas of the National Forests. One important start is to inventory the plants and animals in the forest and the pressures on their survival. (Individual, State College, PA - #A15450.30400)

1507. Public Concern: The Forest Service should employ the same forest management strategies in roadless areas that are used to protect communities and private property from fires beginning on other lands.

BECAUSE FOREST FIRES OFTEN BEGIN ON DEVELOPED PRIVATE LANDS

If there is a correlation between the initiation of forest fires and the degree of roadlessness, the Forest Service should bring this information forward. I have seen no study that would support the contention that wildfires are more or less likely to be initiated on roadless versus public lands. In the area of the Gallatin National Forest, at least two of the dozen or so fires of the past two seasons have started on developed private lands. I would argue, therefore, that the same strategy that is employed to protect communities and private property from fires beginning on other types of land should be employed. (Individual, Bozeman, MT - #A17508.30430)

Adequacy of Analysis

1508. Public Concern: The Forest Service should evaluate wildfire risks.

CONSIDER THAT ROADLESS AREAS DO NOT HAVE A HIGHER RISK OF WILDFIRE

One of the most common arguments that have been raised by roadless area protection opponents is the fact that there will be increased wildfires if there are no more roads or logging in these areas. In the following paragraphs I have included some research that proves the fact that roadless areas do not have a higher risk of wildfire.

Throughout the Northern Rockies, many logging activities are justified as a means of controlling potential future wildfires, as a means to reduce build-up. Wildfire is controlled by other factors other than just fuels build-up or vegetational age. In fact, weather and climate are the most important factors.

Logging generally removes the larger trees, leaving the small fine fuels, which are very good at carrying a fire. Logging simply changes the intensity of fire in a stand of trees, not its spread from stand to stand. Logging does little to stop fire spread, rather it just changes the intensity.

A Forest Service report, "Forest Resources of the United States" (1994), revealed that tree mortality in the West due to both fire and disease increases in logged areas. The worst rate were on private lands where logging levels are highest and where the least natural forest remains. For example, in western forests from 1986-1991, mortality due to fire and disease on private lands increased 20 percent, while it increased only 3 percent on National Forests and decreased 9 percent on other public lands.

"Fires in unroaded areas are not as severe as in roaded areas because of less surface fuel, and after fires at least some of the large trees survive to produce seed that regenerates the area. Many of the fires in unroaded areas produce a forest structure that is consistent with the fire regime, while the fires in the roaded areas commonly produce a forest structure that is not in sync with the fire regime. Fires in the roaded areas are commonly more intense, due to drier conditions, wind zones on the foothill/valley

interface, high surface fuel loading, and dense stands." (Evaluation of EIS alternatives by the Science of Integration Team, ICBEMP, page I-281)

"Logging areas generally showed a strong association with increased rate of spread and flame length, thereby suggesting that tree harvesting could affect the potential fire behavior within landscapes. As a by-product of clearcutting, thinning, and other tree-removal activities, activity fuel creates both short- and long-term hazards to ecosystem. Even though these hazards diminish over time, their influence on fire behavior can linger for up to 30 years in dry forest ecosystems of eastern Oregon and Washington." (Huff, M.H., R.D. Ottmar, E. Alvarado, R.E. Vihanek, J.F. Lehmkuhl, P.F. Hessburg, and R.L. Everrett. 1995. Historical and current landscapes in eastern Oregon and Washington. USDA Forest Service Pacific Northwest Research Station Gen. Tech. Rep. PNW-GTR-355.) (Organization, Bozeman, MT - #A15467.30511)

The existing Roadless Rule presently accounts for protection of public and private lands from severe wildfire and insect and disease outbreaks. This is accomplished through the Rule's exception which provides that "a road may be constructed or reconstructed in an inventoried roadless area if . . . [a] road is needed to protect public health and safety in cases of an imminent flood, fire, or other catastrophic even that, without intervention, would cause the loss of life or property."[Footnote 9]

Despite the Roadless Rules above-cited exception, I know that many opponents of the Rule nonetheless claim with great vehemence that the Rule will greatly reduce the Forest Service's ability to undertake fuel management and will therefore result in many terrible wildland fires on national forest land. This position, however, ignores much of the analysis contained within the Final Environmental Impact Statement. **In fact, according to the FEIS, the roadless rule will have no effect on the frequency and intensity of catastrophic fires on inventoried roadless areas.** [Footnote 10]

A necessary starting point to any discussion on how the Roadless Rule might impact fuel treatments in inventoried roadless areas in the Forest Service's acknowledgement in the FEIS that "in inventoried roadless areas, very little fire hazard reduction work has occurred in the past and little work is planned for the future."[Footnote 11] This is because:

Regardless of whether there is a prohibition on timber harvest in inventoried roadless areas, the highest priorities for fuel management work will continue to be on NFS lands outside of roadless areas where natural resource values or potential threats to human communities are the highest. [Footnote 12]

In fact, because of the much higher prioritization established for the treatment of National Forest Service lands that are roaded, the FEIS assumes that, across all for the Rule's considered alternatives, including the "no action" alternative, "fire hazard reduction work would not begin in inventoried roadless areas for at least 20 years, the estimated time it would take to address the extremely hazardous fuel situations that exist outside roadless areas."[Footnote 13] This 20-year forecast for the initiation of any wide-scale fuel management activities in inventoried roadless areas, however, may overstate how soon such projects may actually begin. As the FEIS further explains, "Some agency personnel think the 20-year timeframe is overly optimistic, and that it would take a much longer period to correct the hazardous fuel situations in roaded landscapes."[Footnote 14]

An analysis of the fire risk faced by the Roadless Rule's inventoried roadless areas is further illuminating. Within inventoried roadless areas, 19 million acres face a low risk of wildland fire, 14 million acres face a moderate risk of fire, and 8 million acres face a high risk. [Footnote 15] It is critical to note, however, that these risks rankings do not describe the probability of a fire occurring. Rather, the classification scheme refers to "the potential harmful effects to key ecosystem components and human communities . . . that can occur once a wildland fire ignites and burns."[Footnote 16]

Understanding this nuance of the risk characterization scheme is key because it indicates that extensive roadbuilding in "high risk" forests to promote mechanical forest treatment is actually counterproductive; roadbuilding should be banned from such fire-sensitive areas because **"[a] human-caused wildfire is nearly five times more likely to occur on essentially roaded lands than on essentially unroaded lands."** [Footnote 17]

This point cannot be emphasized enough: fires are actually more likely to occur in roaded areas than in unroaded areas, meaning that a concern for reducing catastrophic wildland fire actually weighs in favor of the existing roadless rule.

Further, in instances where mechanical treatment is necessary to reduce unnatural fuel buildups, the Roadless Rule still provides "a full array of fuel treatment options,"[Footnote 18] the implementation of which is expected to produce no change in the number of large wildland fires or acres burned when compared with the status quo. [Footnote 19] (Individual, No Address - #A5948.30400)

CONSIDER THAT THERE IS NO CAUSAL LINK BETWEEN UNCONTROLLED WILDFIRES AND THE PRESENCE OR ABSENCE OF ROADS

As study after study has proven, there is no causal link between uncontrolled wildfires and the presence or absence of roads. Scenic America believes that maintaining existing roadless areas under the rules and regulations set forth in NFMA will protect forest health. (Organization, Washington, DC - #A22098.30100)

CONSIDER THAT THE MAJORITY OF ROADLESS AREAS ARE NOT SITUATED IN AREAS OF HIGH FIRE RISK

Speaking specifically to roadless lands in California and the Sierra Nevada, the majority of the lands proposed for protection are not situated in areas of high fire risk. Most of the areas in the Sierra Nevada are in high elevation areas with low fire return rates and relatively high moisture content vegetation. Only a very small percentage of the roadless lands carried under the January 12th rule are in high fire risk areas. In the limited amount of roadless area acres where severe fire risk is an issue, the January 12th rule provides for exemptions, road-building and logging when needed to address concerns regarding wildfire and forest health and imminent threats to public health and safety. There is local area discretion that allows land managers to thin small diameter trees to restore ecological processes (such as regular fire cycles), improve habitat for endangered species, and reduce fire hazard. (Organization, Placerville, CA - #A22653.30100)

Most forest fires are started by careless campers, vandals, and sparks from vehicles. Keeping an area roadless will do much to protect it. Most roadless areas are in remote areas and danger to homes and property is all to often overstated. (Individual, Sacramento, CA - #A8271.30000)

The vast majority of land area in all national forests is already accessible by roads and trails. Many areas are also not fire and disease prone. For example, the Tongass National Forest is virtually free of any fire danger and disease risk. Where disease and fire are risk factors for communities, adjacent property, or forest infrastructure, procedures may easily be developed and implemented to systematically address case specific problems while ensuring the fullest possible compliance with the letter and intent of the policy. (Individual, Douglas, AK - #A13479.30200)

How should inventoried roadless areas be managed to provide for healthy forests, including protection from severe wildfires and the buildup of hazardous fuels as well as to provide for the detection and prevention of insect and disease outbreak?

The quick answer to this is that remote roadless areas generally do not need active management and fire protection. The best way to manage these forests is to leave them alone.

The national forests of the interior West have been subjected to a century of fire suppression and high-grading of timber, which have left the forests at increased risk of catastrophic fires and disease outbreaks.

Roadless areas, by their remoteness and inaccessibility, have been least affected by this misguided policy. Today they contain the healthiest forested landscapes in the mountain west. A comparison of the relatively inaccessible Selway-Bitterroot country in Idaho and Montana - having ubiquitous fire sign and park-like stands of large ponderosa pines and Douglas-fir - with the heavily roaded Wallowa-Whitman National Forest's overstocked, doghair stands choked with grand fir understories, says it all. (Organization, Seattle, WA - #A21694.30100)

CONSIDER THAT FIRE FREQUENCY INCREASES AS ROAD DENSITY INCREASES

Roads have had a profound effect on fire frequency, severity, occurrence, size, and fire regimes throughout the western United States (Habeck, 1990). Fire occurrence increases as road density increases because man-caused fire risk also increases. (Individual, Las Vegas, NV - #A5694.30430)

1509. Public Concern: The Forest Service should conduct more studies about how to control fires.

SO THAT FIRES DO NOT GET OUT OF HAND AS A RESULT OF THE MANY VARIABLES THAT CAN AFFECT THEM

Instead of building roads to allow better access to fires we should design a plan where we either attempt to clear out the dead wood that fuels fires or have controlled burns that can have a very positive effect on the environment. However, fire is difficult to control and more studies need to be done about how to control a fire so that it does not get out of hand as a result of the many variables that can affect a fire such as wind. (Individual, No Address - #A30364.30400)

1510. Public Concern: The Forest Service should consider the impact of human activities on fire intensity and severity.

It is important to note that Forests in unroaded, unlogged areas are the least altered from historic conditions, have the greatest ecological integrity and most fire resilience, and are at lower fire risk than areas that have been intensively managed. This is because roadless areas have not been subject to logging and concomitant activities that offer increase hazardous loads of highly-flammable small-diameter surface and ladder fuels, have not been as altered by fire suppression, especially compared to roaded and logged lands, and present the lowest risk of human-caused ignitions. Logging in wildlife habitat. It also takes massive federal subsidies because roadless area timber sales are some of the biggest money losers due to roadbuilding costs.

The primary cause of increasing fire intensity and severity is a century of aggressive firefighting, commercial logging, livestock grazing, and road building. Analysis of the 2000 fire season revealed that the majority of burned acres were located in logged and roaded forests, not in roadless or wilderness areas. In its report on last year's fires, the Congressional Research Service concluded,

"Timber harvesting removes the relatively large diameter wood that can be converted into wood products, but leaves behind the small material, especially twigs and needles. The concentration of these 'fine fuels' on the forest floor increases the rate of spread of wildfires."

In 1996 U.S. government scientists issued the Sierra Nevada Ecosystem Project (SNEP) report. The SNEP report found,

"Timber harvest, through its effects on forest structure, local microclimate and fuel accumulation, has increased fire severity more than any other human activity."

The scientists also determined that,

"Fire severity has generally increased and fire frequency has generally decreased over the last 200 years. The primary causative factors of fire regime changes are effective fire prevention and suppression strategies, selection and regeneration cutting, domestic livestock grazing, and the introduction of exotic plants." (Organization, Santa Fe, NM - #A22092.30100)

There will probably be less protection necessary, because roadless areas are by definition undeveloped; and because they haven't been logged, they will most likely have less slash and other fuels to carry a fire. Case in point: the Clear Creek Fire near Salmon, Idaho in the summer of 2000, burned hottest and with the most devastation in the Panther Creek drainage, an area that was heavily roaded and had been heavily logged over. That's a pretty typical scenario. So much for the popular fiction that roading and logging reduce fuels and the hazard of fire.

Besides, the Clinton Roadless Initiative took this very unlikely scenario into consideration and made generous allowances for such an eventuality, with loopholes big enough for an unscrupulous forest

supervisor to drive a dozen log trucks abreast though. This "issue" is a straw dog. (Individual, Leadore, ID - #A28841.30000)

1511. Public Concern: The Forest Service should consider other factors which may increase fuel loads and fire hazards.

WIND

June 2001. 40 acres of my timber in forest crop program was flattened by tornado winds. Now I have a helluva job to clean this mess you and I can see what a terrible fire hazard it is. (Individual, Turtle Lake, WI - #A6075.30400)

The July 4th blowdown of approximately 50% of the BWCAW's forest should have been a more than adequate warning that un-managed forests can be devastated at a much greater percentage than managed forests, and that designated roadless areas that experience this type of devastation are forest fire catastrophes waiting to happen. (Elected Official, Two Harbors, MN - #A15552.30100)

In exceptional cases where insects and fuels do become a hazard, an environmental impact statement for proposed action can be prepared. This was done in the Boundary Waters Canoe Area Wilderness after a 1999 storm left ten times the normal fuel buildup. (Organization, Minneapolis, MN - #A22652.30600)

WEATHER

Severe wildfires burn catastrophically according to the fire weather, not the absence of roads. Roads can create vectors for flammable exotic plants that increase damage to native plants and animals during fire events. Roads encourage the misuse of DFPX construction and backburn fire suppression attempts. I am currently commenting on a fire salvage operation that is being conducted on land burned by fire suppression attempts (backburning off of a road) that never even connected with the main body of the wildfire. Forests that have not been pierced by roads tend to have more old growth (fire resilient) stands. Forests have evolved for millions of years with fires and without roads. The increase in catastrophic fires is due primarily to timber harvest and its effect on forest structure (SNEP). (Organization, Chico, CA - #A25114.30300)

SLASH PILES

Slash piles on lands where trees are gone contribute to fires. (Individual, Spokane, WA - #A13986.30550)

As for "the buildup of hazardous fuels", in the Intermountain and Great Basin West, and probably in much of the rest of the country, it's too cold and dry for logging and thinning slash to be left on the forest floor and expected to decompose. Slash and other logging / thinning debris will just lay there and contribute to an even bigger fire hazard unless it's chipped and scattered on site or completely removed from the forest - neither of which, are very economically viable propositions. (Individual, Dillon, MT - #A28767.30550)

In terms of forest protection, I fail to see how building more roads protects the forest. From experience, the forests on both private and public lands that have an infrastructure of roads are no less resistant to insect attacks, disease or wildfire. These roads only serve the purpose of allowing "pre-salvage operations" - allowing healthy trees to be harvested on the grounds that they would likely die anyway. Cutting out damaged stands (i.e. bug spots) does not necessarily halt the spread - sometimes it creates a larger threat - the presence of fresh slash. Additionally, humans serve as vectors of disease and wildfire-increasing human presence in these areas via roads may actually increase the threat of damage from insects, disease and wildfire. (Individual, Nickelsville, VA - #A30521.30100)

SOME TREE SPECIES HAVE A NATURALLY SEVERE FIRE REGIME

Forests were protecting themselves long before the FS showed up. Protecting the Forests for human values is what we are really talking about. I am suspect of plans that want to save forests from severe

wildfires. Some forest types (lodgepole pine, subalpine fir) only burn severely under natural conditions. That is what they do. Douglas fir/Ponderosa pine forests, at least here in Washington are overstocked with dog-hair stands, and are prone to "unnaturally" severe fires. But, these low elevation forests are already roaded and have been for decades. What is left in the roadless area is the hard to get stuff. If it was easy to build a road there it would have been done 30 years ago. Those roadless areas that are in need of thinning to get back to a low intensity fire regime should be helicopter, or horse logged. Yes, really. (Individual, Carlton, WA - #A30322.30100)

In forest systems that are naturally characterized by infrequent high intensity fires (e.g. Rocky Mountain spruce/fir and lodgepole pine forests, Pacific Northwest Westside forests, higher elevation Sierra Nevada forests), fires should be left to burn naturally in roadless habitats. In these systems, stand replacing fires help to recycle nutrients, open seeds of some pine species, and increase habitat heterogeneity at the landscape scale (maintain a healthy mixture of forest and meadow habitats that support many important plant and wildlife species). (Individual, Davis, CA - #A30523.30310)

Roadless areas should be managed to be sustainable. I would also add that in some forest types such as Rocky Mountain lodgepole pine and sub-alpine fir-spruce periodic stand-replacement crown fire are ecologically appropriate. These ecosystems are adapted to stand-replacement fires every 50-150 years or so. Removing fires of this type in these ecosystems will reduce forest health. It is another matter when talking about ponderosa pine and mixed conifer forests. These ecosystems have been drastically altered by fire suppression, livestock grazing, and past harvesting. They are in dire need of restoration and the majority of these areas are already roaded. (Individual, Berkeley, CA - #A30558.30300)

Adequacy of Analysis – Management Strategies

1512. Public Concern: The Forest Service should evaluate its firefighting practices.

[From ATT 3]

WILDLAND FIREFIGHTING PROBLEMS

Is the Forest Service doing all that they can to suppress our large wildfires?

When wildland fires escape initial attack capabilities of our local crews, a team is called in to take over the fire. Some team managers do not believe in fighting fire at night, or in putting retardant on the fire before noon. Almost all firefighters would agree that fighting fires at night is most effective because, in general, temperatures are lower, humidity is higher, wind speed has lessened, and the level of fire activity has decreased.

Putting the fire crews on the line around mid morning, and waiting until afternoon for retardant drops when the fire has escaped and is crowning, are not conducive to trying to control the fire. These practices have increased the cost in money and resource loss considerably. Retardant in the early morning would cool down hot spots and aid in line building so that fire might not escape during the afternoon.

The same team members who delay retardant drops till afternoon use the excuse that fire fighting is more dangerous at night. I have yet to see any statistics that prove this. This excuse also fails to explain why they do not encourage retardant drops in the morning, before the fire is crowning and carboniferous cumulus clouds have obscured visibility.

The same team members that wait till mid morning to fight the fire also want to evacuate private property owners, leaving their homes and land possibly unprotected. Citizens are intimidated by federal, state and county law enforcement officers and leave, only to return to the new Black Forest and the charcoal remains of their structures.

The Forest Service has policies such as the Minimal Impact Suppression Tactics, which encourage firefighters to construct firelines much too narrow to stop a fire and do not permit bulldozers and other heavy equipment in certain areas. Under the Clinton Administration proposed Roadless Initiative, not only are new roads [not] permitted in vast areas, but firefighting equipment such as engines cannot

utilize existing roads that have been there for decades. Old time firefighters would turn over in their graves if they could be aware of what is happening today.

Environmentalists have succeeded in stopping logging on federal land, and are now at work trying to stop state and private harvest units. They mislead the public into believing that logging units enhance forest fires, when the fact is that they greatly reduce the probability that a fire will turn into an inferno. With the removal of ladder fuels and a great many mature trees left, these almost resemble picnic grounds, and they certainly deter the spread of fires. Older harvest units (clear cuts), which contain young trees with much higher fuel moisture, protect stands of timber uphill and down wind from them. Pictures on the website show how these 15 year old clear cut units in Magpie and Hellgate Gulches on the Cave Gulch Fire have helped efforts to control wildfires.

Some environmentalists do not want retardant dropped on fires to help control the spread of wildfires because the retardant contains chemicals. Retardant is a fertilizer, ammonium phosphate, which will increase regrowth in the years after the fire.

Environmentalists also say that because fires have been suppressed in the past, this has led to major fires now. The year 1910 is still the worst fire season on record, but no one says that this was the result of earlier fire suppression attempts. Anyone who would advocate letting a wildland fire burn during a drought fire season, risking loss of life and property, is not rational. (Individual, East Helena, MT - #A20422.30400)

1513. Public Concern: The Forest Service should fairly and fully consider the effects of fuel management.

Concerns for fire suppression and potential have been raised from both outside and within the agency. Some claim that roading and logging of roadless areas is necessitated by these concerns. But it must be remembered that "uncertainty exists among fire researchers concerning whether the number of acres burned annually by wildfires is always reduced by timber harvest . . . whether timber harvesting also reduces the final size of large wildland fires is debatable. Timber harvesting 'opens' up a forest [so] . . . after a fire starts, it can sometimes spread faster and become bigger." (DEIS 3-156; see also 3-106). As for roadless areas, "since the amount of land area at risk to large wildland fires is so large compared to the small amount of road that could be built into those same areas, the effects in the near future to the fire suppression program are expected to be negligible. . . . the effect of timber harvesting is insignificant, as is the combined effect of no timber harvesting with no road construction, to the overall fire suppression program. . . . The direct effect on the wildland urban interface [WUI] is minimal because there are few populated areas adjacent to inventoried roadless area boundaries" (id.). There are numerous problematic issues even if one assumes that building a road into an area would limit future wildfires (DEIS 3-158).

One fact is foremost regarding this issue of fires vis-a-vis roadless areas: "Areas that are more highly roaded actually have a higher potential for catastrophic wildfires than inventoried roadless areas." (DEIS 3-157). "Building a road into a high risk from catastrophic fire forest would increase the incidence of human caused fires." (DEIS 3-158).

In Virginia on the GWNF a mean average of only about 4 fires per year are attributed to lightning (SAA Report 5 page 96). On the JNF approximately 90% of the fires will be human caused (1996 Analysis of the Management Situation page 2-48). Keeping all this in mind, it is unreasonable for the agency to conclude that air quality would be diminished by an increased risk of catastrophic wildland fires resulting from a prohibition on road construction and timber harvest (DEIS 3-46).

Because of the amount of acres the FS claims is at moderate or high risk from catastrophic fires (DEIS 3-101) coupled with the small amount of acreage in roadless areas that could potentially be treated for fuel management objectives (DEIS 3-104-106), it is entirely unreasonable for the agency to find that a prohibition of logging and roading "would seriously hamper the Forest Service's goal of reducing the threat from catastrophic forest fires." (DEIS 3-107). And it must be remembered that the potential risk for fires is much less in the generally much moister Eastern National Forests. The final EIS needs to substantiate that hundreds of thousands of acres are at moderate to high risk in the Southern and Northeastern NFs; the figures given appear to be greatly overestimated, particularly for Virginia and West Virginia (DEIS 3-103).

In addition, a fundamental tool for reducing fire hazard is the reduction or disposal of the small diameter and fine fuels (DEIS 3-100). Yet this is often not the on-the-ground reality. Logging predicated on reducing fire potential usually removes the fuels that least facilitate a fire's intensity and rate of spread (the large diameter boles) while the more hazardous small fuels remain on site. A perfect example of this in Virginia was the recent Hagan Hall emergency salvage sale on the Clinch Ranger District of the JNF. The affects of fuel management are not fully and fairly considered in the DEIS. (Individual, Staunton, VA - #A29325.30400)

BEFORE A FINAL DECISION ON MANAGING AREAS AS ROADLESS IS MADE

As stated above, roadless areas adjacent to Mammoth Lakes have been subject to decades of fire suppression, allowing fuel loading to increase to dangerous levels. A detailed assessment of fuels management should be completed before a final decision on managing as roadless is made. The Rainbow Fire of 1992 demonstrated how vulnerable the community is to wildfire beginning in roadless/wilderness areas. (Manager, Town of Mammoth Lakes, CA - #A19393.30110)

1514. Public Concern: The Forest Service should adequately analyze the appropriateness and need for prescribed fire.

IN THE UNIQUE SETTINGS OF THE ROADLESS AREAS

The limited extent of fire suppression and management activities in roadless areas may render prescribed burning unnecessary. The EA fails to adequately analyze the appropriateness and need for prescribed fire in the unique settings of the roadless areas. Rather, the EA analyzes the vegetation conditions over the entire project area. Frost (199) addresses the lesser alteration of the vegetation conditions in roadless areas:

An analysis of scientific literature on the relationship between fire and forest management reveals that forests in roadless areas are the least altered from historic conditions and present a lower fire hazard than forests in managed areas, because they have: 1) not been subject to timber management activities that often create increased fuel loads and reduce resilience to fire, 2) have been less influenced by the effects of fire suppression than previously managed lands, and 3) the lowest risk of human-caused ignitions. (Organization, Missoula, MT - #A613.30300)

1515. Public Concern: The Forest Service should fully analyze restoration projects designed to address catastrophic wildfires.

Restoration projects that are designed to address catastrophic wildfire risks must be analyzed fully within the context of the Roadless Rule, and such projects must ensure that adequate safeguards are taken to preserve the roadless and Wilderness qualities of the IRAs, including restrictions on types and sizes of tress to be thinned, limitations on sizes of openings, use of prescribed burns, total rehabilitation of forwarder or skid trails and general attention to site specific analyses that do not gloss over the biological differences exhibited between roaded and unroaded lands. (Organization, Denver, CO - #A8824.31100)

TO ENSURE ADEQUATE SAFEGUARDS ARE TAKEN TO PRESERVE ROADLESS AND WILDERNESS QUALITIES OF INVENTORIED ROADLESS AREAS

Restoration projects that are designated to address catastrophic wildfire risks must be analyzed fully within the context of the Roadless Rule, and such projects must ensure that adequate safeguards are taken to preserve the roadless and Wilderness qualities of the IRAs. (Organization, Littleton, CO - #A8829.30400)

1516. Public Concern: The Forest Service should address the cumulative impacts of the fire suppression program on national forests, and how it has impacted roadless areas.

Should the Forest Service still deem it necessary to re-open discussion of the Roadless Rule, the following issues and concerns [should] be addressed along with the 10 questions in the ANPR.

The cumulative impacts of the fire suppression program on National Forests, and how it has impacted roadless areas must be addressed. (Business, Spokane, WA - #A22047.30100)

1517. Public Concern: The Forest Service should reassess vegetation management on the national grasslands.

BECAUSE INCREASING VEGETATION HEIGHT AND SHRUB STRUCTURE ON THE UPLANDS AFFECTS FIRE CONTROL AND SUPPRESSION

While the 2000 fire season forced the Forest Service to rethink its forest management strategy, there has been no comparable reassessment of vegetation management on the National Grasslands. The HAND comments addressed the concern about increasing vegetation height and shrub structure on the uplands would affect fire control and suppression. The transportation, OHV, and roadless policies all directly interfere with fire suppression and control by restricting access and prohibiting cross-country access. The catastrophic fire in 1999 on the Little Missouri National Grassland proves that the risk is real. However, the Forest Service has declined to change the proposed upland vegetation objectives, which will increase fuel loading, and reduce grazing, which would otherwise control fuel loading. Again, the Forest Service needs to comprehensively address this issue and to date it has failed to do so in North Dakota. (Organization, Denver, CO - #A21358.30100)

1518. Public Concern: The Forest Service should evaluate the impacts of no management versus the impacts of roading or other management activities.

It is essential that roadless areas be accurately mapped, including those areas at risk of wildfire and insects and disease so that management options can be accurately assessed. In our opinion, the draft and final environmental impact statements for the previous rule did not adequately address wildfire risk. It is imperative that the Forest Service requires that the risks and impacts of "doing nothing" be documented as well as an analysis of the risks or impact of roading or other management activities. In the final decision, the standards for no management on federal forest lands should be as stringent as any standard for management activities. (Association, Rockville, MD - #A13306.30100)

1519. Public Concern: The Forest Service should conduct ecological assessments.

FOR ALL FUEL REDUCTION PROJECTS

Conduct ecological assessments for all fuel reduction projects. The Forest Service should identify restoration priorities before any fuels reduction activities commence. This assessment should involve the public and provide an array of alternatives—not just commercial thinning — to address needs. For many areas, removing roads, invasive species, and cows, combined with prescribed burning, would be the best prescription for ecological restoration. (Organization, Missoula, MT - #A17234.30920)

1520. Public Concern: The Forest Service should categorize inventoried roadless areas in accordance with fire regime, condition class, vegetation, and risk of disease.

AREAS AT GREATER RISK OF ECOSYSTEM DAMAGE FROM CATASTROPHIC FIRES SHOULD BE PRIORITIZED FOR APPROPRIATE TREATMENT

Inventoried Roadless Areas (IRAs) should be categorized in accordance with fire regime and condition class and risk of disease, using the best available information. IRAs at greater risk of ecosystem damage through catastrophic fires should be prioritized for appropriate treatment, including commodity harvest if no other management tool appears feasible. IRA management guidelines should also include provisions for allowing temporary roaded entry into roadless areas in the event of catastrophic wildfires or tree-killing insect and disease outbreaks, so that commodity values can be captured and rehabilitation work performed at a reasonable cost. (Governor, State of Idaho - #A20141.30100)

THEN CREATE A MANAGEMENT PLAN TO OBTAIN AND MAINTAIN DESIRED FUTURE CONDITIONS

[Q10] I believe they all need to be inventoried and classified by the types of vegetation and fire regimes. Those that are adapted to low frequency, stand replacement regimes need to be differentiated from those that once experienced frequent, low-moderate intensity fire regimes. Once this is done then a management plan can be created to obtain and maintain desired future conditions. I think Wildland Fire Use (old prescribed natural fire) will be very important in these areas. There [would] certainly be constraints by managing wildland fire in many areas [that] would be appropriate. [In] other areas that once had high frequency, low-moderate intensity fire regimes, some mechanical treatments may be appropriate before re-introducing fire. We presently have millions of acres of roaded national forests with fuel hazard problems, I believe we should start to work in these areas. This work alone will take decades. I believe that active management is needed in all forested areas of the US. Some areas may use mechanical methods more, others such as many roadless areas should manage wildland fire to obtain the desired future conditions. Developing more partnerships with state, local, and public groups is good but it will not provide a fast solution to this problem. (Individual, Berkeley, CA - #A30558.30400)

1521. Public Concern: The Forest Service should consider that thinning has not been shown to systematically reduce the intensity of wildfires.

Assertion: roadless area decisions should protect forests from wildfire, insect, and disease impacts (p. 4). In fact, road building is associated with increased fire starts and the spread of harmful invasive species and pathogens. Roadless areas are among the lands least in need of remedial management. And the silvicultural management restricted by the Roadless Rule, thinning, has not ever been shown systematically to reduce the intensity of subsequent fires. (Organization, Olympia, WA - #A20145.30100)

1522. Public Concern: The Forest Service should allow public review of the Wildland Fire Management Policy.

The Wildland Fire Management Policy must be publicly reviewed and cleansed of all the Clinton-Gore-Babbitt holistic forest agenda. The idea of allowing natural or manmade wildland fires to burn for the reduction of hazardous surface, latter and canopy fuels is insanity. We have 35,000,000 in this state and utilization of fire for the reduction of fuel is out. (Professional Society, Chico, CA - #A29719.30410)

Funding

1523. Public Concern: The Forest Service should evaluate costs and funding associated with fire management.

FIRE SUPPRESSION COSTS

Suppressing fires and cutting trees ostensibly to save forests also burn the taxpayer. A new report published by taxpayers for Common Sense finds that mismanagement of National Forests made the 2000 fire season the most expensive fire year in history. The government spent a record $1.6 billion fighting the worst wildfires our nation has seen in decades. According to the taxpayer group, federal policies "encourage spending unlimited amounts of money attempting to put out every fire. This increases firefighting costs and jeopardizes firefighters' lives by subjecting them to unnecessary risks." The report also criticizes Congress for having made little effort to control firefighting costs, which has increased by 50 percent over the last two decades. Congress gives federal agencies bottomless emergency budgets for firefighting, with little auditing to examine how they spend money. In reality, Congressional funding priorities have exacerbated the wildfire situation by impeding natural fire regimes and subsidizing commercial logging on public forests. The Forest Service's funding has become a vicious cycle. Taxpayer money is used to log the National Forests to benefit timber companies, which contribute to the escalating risk of catastrophic wildlife. Then, huge additional sums of taxpayer money are spent trying to put the fires out. (Oppenheimer 2000) (Organization, Nevada City, CA - #A4941.30900)

As noted above, logging roads are typically high risk/high hazard areas since they are sites of frequent human ignitions and dense flammable fuels. However, it is acknowledged that roads can, at times, help fire suppression efforts because they provide the cheapest, safest means of transporting large numbers of firefighters (although traffic accidents are a major source of serious injuries and fatalities on wildfires). Roads also provide access for heavy equipment such as bulldozers, water trucks, and fire engines. Roads also provide a ready-made fireline for backfire/burnout operations which, ironically, can increase the total amount of burned acreage. Indirect attack strategies automatically sacrifice acreage to the wildfire, especially if large backfires are ignited; thus, another paradox: wildfires often increase in size in the act of trying to contain and control them.

The USFS created standing crews of smokejumpers, hotshots, helitacks, and helirappellers for the purpose of initial and extended attack fire suppression in roadless areas. The speed, mobility, and versatility of aerial-based fire suppression forces are making them more attractive to fire managers. While it can cost thousands of tax dollars to purchase and maintain a fire engine, it can only be used efficiently by a small crew (approximately 3-5 workers) and its use is largely restricted to a single District on a single Forest. The same amount of money invested in aircraft and associated crews and equipment can be mobilized to protect whole Regions or can be dispatched nationally or internationally depending on the need, and can be more easily shared among other federal, state, and local fire protection agencies. Consequently, given modern technology and the huge number of helicopters and fixed-wing aircraft available for fire suppression duty, roads are not necessary in order to suppress fires. (Organization, Eugene, OR - #A21798.30200)

FIRE SUPPRESSION COSTS AND CONTROLLED BURN FUNDING

The American taxpayer simply cannot continue to afford the high prices of controlling wildfires through aggressive suppression efforts. This is because years of suppression has built up fuel loads beyond where they can be safely burned, even under controlled conditions. The best way to bring this fuel loading back into balance with historical conditions is with controlled burning, because logging and thinning do not address the standing log volume that represents much of the risk. However the Okanogan National Forest states that their requested Congressional budget for controlled burns is 90% short of what they requested as necessary. (Organization, Winthrop, WA - #A20338.30420)

FUNDING FOR FIREFIGHTING

Laverty should know that pre-settlement fires, wilderness fires, the Bitterroot fires on logged-over lands, and even controlled fires have all burned so hot that "some places will take centuries to recover." In the post-firescape of the Scapegoat Wilderness, stark, with nearly all snags still standing since 1988, some reproduction grows as thick as grass while other areas show little or no generation of any flora. But his excessive caveat, "devastating," gets not only outlays for smokejumping, hot-shot crews, air-tanker support, and large standing armies of firefighters, but now, rural-urban fire protection and forest-wide controlled burning.

Fire is money. The fire suppression problem your agency moans about was created mainly by funding for fire suppression, now a bigger money maker than logging. Now the agency claims that bio-mass loading threatens the old-growth communities that it prefers to destroy by overcutting.

The National Fire Plan is primarily a logging plan. Sixty percent of its funding, according to Laverty, will pay for fire protection in the rural-urban interface, another big FS money-maker. This funding would be more equitably spent buying interface lands for parks and recreation spaces that would be turned over to counties for fire protection. (Individual, Corvallis, MT - #A5960.30400)

It is also obvious to me that making some decisions will mean that large wildfires may inevitable. That also must be a factor in the decision process and not an excuse to get Congress to buy a bigger fire engine and crew. The place of fire as an ecological perturbance and the phenomenon's about it must be accepted in the western US, but the money thrown at it in the name of control must be re-evaluated. (Individual, Cambridge, ID - #A11714.30300)

THE USE OF FUNDS APPROPRIATED FOR FUELS REDUCTION PROJECTS IN THE WILD-URBAN INTERFACE ZONE

Last year Congress appropriated an additional $120 million for fuels reduction projects in the urban-wildland interface zone. Instead of directing resources to protect communities, however, the Forest Service is using emergency monies for large-scale commercial timber sales in the nation's most pristine forestlands, including roadless areas, old growth forests, and habitat critical to imperiled species—areas far from homes and businesses and at least risk of catastrophic wildfire. In testimony before congress, the agency admitted that only 25 percent of the acres treated were in urban-wildland interface areas. (Organization, Nevada City, CA - #A4941.30900)

CONSIDER THAT REDUCED ACCESS INCREASES FIREFIGHTING EXPENSES

Idaho was hit extremely hard during the summer of 2000 by forest fires; the roadless areas hampered access to the areas for fire suppression. The control of the fires could have been faster and more effective had the fire crews been able to reach the areas effected. The cost to the state and the federal government would have been much lower with more adequate access to the fires. Reducing road access, by implementing the "roadless" policy, would make fire fighting even more difficult and expensive in the future. (Elected Official, Council, ID - #A20732.30200)

On the Rogue River NF (RRNF), there are areas mapped in the Applegate Valley and down into the Ashland (Bear Creek) drainage. There are areas identified in the Plans which do not allow road construction; they therefore do not need to be considered here. They should be reconsidered in the next round of forest plans for the RRNF. There are far more areas shown as allowing road construction that are "inventoried". These should have NO additional restrictions placed on them.

On Aug 9, 2001 a dry lightning storm ignited the Quartz fire in this area. It quickly grew to 5000 acres on USFS, BLM and private lands, and destroyed 2 homes. The single greatest impediment to effectively fighting this fire was access; the roads (especially on USFS) were not adequate. This $10+ million fire probably cost twice as much to control due to sustained use of air attack as it would have with adequate roads. The area burned is not an inventoried area but was burning towards one. With the weather conditions we had, if it had burned east and into the Wagner Butte roadless area, there would be no stopping it until it burned down to the city of Ashland. There was unbroken fuel and no roads to gain access. Fortunately this did not happen as the weather moderated.

Much of the area you show in light gray on the maps in the Applegate have this same fuel type, and they will indeed burn in the future. Is restricting access responsible management? I don't think so. Who will benefit? Not any local residents. Is this how I want my public lands managed? Absolutely not. (Individual, Medford, OR - #A27917.30200)

CONSIDER THAT THE MAJORITY OF FIREFIGHTING FUNDS ARE SPENT ON PROTECTING STRUCTURES IN DEVELOPED AREAS

The Forest Service spends the vast majority of its firefighting budget on protecting homes and other structures in developed areas, not in fighting fires in roadless areas. (Individual, Dutton, MT - #A17073.17100)

1524. Public Concern: The Forest Service should not use tax dollars to fund firefighters and their equipment.

BROUGHT IN FROM DISTANT PLACES RATHER THAN THE LOCAL AREA

I am asking a study be originated showing the forest service fire expense for transportation of individual labor from distant places such as California, Australia and equipment from the Midwest and East while refusing to hire individuals and equipment who have made a lifetime livelihood locally for themselves and their families from our timberlands. People who have the vested interests in protecting the forest from fire destruction. My personal opinion is that the Forest Service action to eliminate qualified local firefighters and their equipment from the fire line is criminal and the tax payers should not be required to fund any such irresponsible actions. (Individual, Kalispell, MT - #A8758.30910)

USE THE MONEY FOR OTHER PURPOSES

Economically, I am concerned that limited taxpayer dollars be put to better use than fire suppression in roadless areas. There are certainly many highly constructive (e.g., cancer fighting, land protecting, education supporting, etc.) programs in vital need of these funds, which are currently wasted on fire suppression that results in unhealthy forests and the use of toxic chemicals to combat fire. Furthermore the equipment that is used in such fire suppression operations results in noxious weed invasions and the need for expensive measures to control them. Fire suppression in roadless areas is just as bad economically as it is ecologically. (Individual, Davis, CA - #A30523.30910)

1525. Public Concern: The Forest Service should not use tax dollars for fire suppression and timber removal.

IN ROADLESS AREAS LOCATED FAR FROM RESIDENTS

Fire plays a vital role in western forest and rangeland ecosystems. As a natural disturbance agent responsible for recycling nutrients, regenerating plants, and sustaining diverse wildlife habitats, fire is necessary for the continued productivity of these ecosystems. Certainly, efforts should be made to protect communities in the urban/wildland interface zone, defined as the area "where combustible homes meet combustible vegetation." But pouring taxpayer dollars into suppressing fires and logging in roadless forests located far from residents makes little sense. (Individual, Oklahoma City, OK - #A17236.30300)

1526. Public Concern: The Forest Service should contract with an independent organization to analyze expenses associated with fire management if roads are destroyed.

As lifetime resident of an area relying on the timber I have been vitally concerned with the proposal for the treatment of Federal roadless areas. My purpose in this letter is to ask and if necessary demand that the USDA Forest Service immediately enter into a contract with a qualified, independent, impartial organization capable of providing the following information:

The expense of destroying forest roadways created by logging contractors added to the cost of creating fire lines through the timber lands versus rights-of-way through timber regrowth involving old roads . . . always in place not requiring a great deal of forest destruction. It seems to me that it is far less expensive to utilize an unmaintained road right-of-way as a fire line when needed as opposed to creating an entire new fire line often destroying much of the timber in its path not yet on fire. Added to the cost of destroying roads, creating new fire lines should be destruction of culverts in place. (Individual, Kalispell, MT - #A8758.30200)

1527. Public Concern: The Forest Service should consider that as fuel loads increase in roadless areas, firefighting costs also increase.

New roadless areas will experience an increase in the forest fuel load. This will mean an increase in fire fighting costs for the Forest Service and the Minnesota DNR. Areas experiencing forest fires can only be accessed from the air. (Elected Official, Two Harbors, MN - #A15552.30100)

1528. Public Concern: The Forest Service should provide funding to conduct controlled burns and non-commercial thinning.

TO REDUCE WILDFIRE

Provide them with funding to conduct controlled burns and non-commercial thinning if you really want to reduce wildfire. (Individual, No Address - #A29646.30100)

Fire plan funding to treat fuels is a great program and needs to be continued. (Organization, Wenatchee, WA - #A22628.30410)

1529. Public Concern: The Forest Service should take into account the effects of a national roadless rule on the costs of fire management.

NEGATIVE EFFECTS

Fires cause the loss of many of our natural resources for use, which in turn lose us dollars, extreme amount of dollars are used for fire control and management—and an undetermined cost occurs in the costly price of lives lost. (Individual, Lloyd, MT - #A27949.75600)

In reality, Congressional funding priorities have exacerbated the wildfire situation by impeding natural fire regimes and subsidizing commercial logging on public forests. The Forest Service's funding has become a vicious cycle. Taxpayer money is used to log the National Forests to benefit timber companies, which contribute to the escalating risk of catastrophic wildlife. Then, huge additional sums of taxpayer money are spent trying to put the fires out. (Individual, Washington, DC - #A30150.75610)

1530. Public Concern: The Forest Service should ensure that emergency funds are spent in areas where wildfire truly threatens communities.

Ensure emergency funds are spent in areas where wildfire truly threatens communities and mandate environmental safeguards for fuels reduction projects. (Organization, Nevada City, CA - #A4941.30900)

1531. Public Concern: The Forest Service should continue its current fire plan funding to treat fuels in the wild-urban interface.

Assistance for addressing the current wildfire risk in the wildland-urban interface is essential. The public benefits from reduced suppression costs and losses far outweigh the cost of this assistance. The current fire plan funding to treat fuels is a great program and needs to be continued. (Organization, Wenatchee, WA - #A22628.30410)

1532. Public Concern: The Forest Service should take legal action against organizations which have blocked fuel load removal.

TO RECOVER COSTS FOR FIRES THAT HAVE RESULTED FROM SUCH LACK OF ACTION

It's my perception that the Wilderness advocates are unrelenting, they have no inclination to compromise, and they have the finances to sue to get their way. How does any individual or organization work with that type of attitude? I believe the Forest Service must work with those who will, and adapt a tougher stance against those who won't come to the table and compromise. I'd like to see the Forest Service sue the organizations that have stymied fuel load removal for the cost of the fires that have ultimately occurred for lack of action in this regard. (Individual, Centerfield, UT - #A25652.15000)

Education

1533. Public Concern: The Forest Service should educate the public.

ABOUT FIRE SAFETY

Since so many forest fires are started by campfires, all those entering should have a fire safety lesson. (Organization, Cookeville, TN - #A5451.30610)

ABOUT THE REASONS FOR CONTROLLED BURNING

Adequate knowledge of local conditions together with scheduled controlled burns should be implemented. Due to the over suppression of forest fires in the past, there is the possibility of controlled burns getting out of control but this should not stop the practice. The public should be better educated on the reasons for controlled burns. (Individual, Tucson, AZ - #A4938.30420)

ABOUT THE ROLE OF FIRE AND DISTURBANCE IN FORESTS

The Forest Service clearly needs to help educate the public as to the role of fire and disturbance in our forests. (Individual, Missoula, MT - #A6143.30310)

As far as wildfire and disease outbreak, any ecologist worth his/her salt knows that fire is a natural forest event, and that fire is one of the ways that nature cleanses herself of disease and rebuilds herself. I believe that forest education about fire and some other measures to protect humans should be taken. We can not stop forest fire. It is impossible. And we saw in Florida a couple years back that if we abandon controlled burning and other forest management practices, the buildup of fuel will cause catastrophic fires. We are trying to make nature stop doing what it has been doing for millions of years; we will not win that war, no matter what politicians say. (Individual, Baton Rouge LA - #A30621.30300)

ABOUT WHAT IS NEEDED TO SUPPORT FIREFIGHTING EFFORTS

I do not know exactly what would be needed to support firefighting efforts and would appreciate being educated about that matter. (Individual, No Address - #A26070.30610)

Active Management

1534. Public Concern: The Forest Service should use various techniques for fire prevention.

IF REQUIRED BY MANAGEMENT OBJECTIVES

As far as wildfire is concerned it has been a part of the natural forest regime as far back as we can find evidence in the charred remains of preexisting forest on the Olympic Peninsula. Henderson et al, did studies of old fire occurrences as part of their basic work for the preparation of the Forest Plant Associations of the Olympic National Forest R6-ECOL-TP 001-88 1989, and found that there were very few fires of appreciable size in the east side if the Forest 480, 680 and 750 years ago, while much of this area had burned several times in the past 700 years. If management objectives for the area identify prevention of severe wildfires as an objective then a regime of preventive measures can be prescribed. Many techniques are available. Most of these were identified in the Regional Forest Fire Planning effort in Region 6 in the mid 1970s which was never completed. It is possible that written copies of the plans and atlases that were prepared then are still in existence in some archive somewhere.

With the current interest in wildfire suppression and the recent deaths of the 4 firefighters on the Okanogan-Wenatchee Forest there will probably be a one, possibly two year, spurt of interest in wildfire and prevention, but as has happened previously it'll probably pass away until we have to relearn the lesson again in 5-10 years. (Individual, Olympia, WA - #A278.30610)

MONITORING

If enough monitoring is set up, wildfires can be detected early and hopefully controlled away from populated areas. (Individual, Rego Park, NY - #A5996.15161)

GRAZING

On the National Grasslands, the Forest Service plan for roadless areas needs to include provisions to manage coulees, etc. so that wildfires can be effectively controlled quickly. The only way to effectively manage for healthy grasslands is with livestock grazing. (Association, Watford City, ND - #A29131.30500)

The catastrophic fire in 1999 on the Little Missouri National Grasslands proves that the fire risk is real. However, the Forest Service has refused to change the proposed upland vegetation objectives, which will increase fuel loading, while reducing grazing. Reasonable, efficient livestock grazing is a proven method of controlling fuel load and should be maintained. At the same time, sound scientific data has also demonstrated that livestock grazing adds to the healthy plant growth of rangeland.

The HAND group comments earlier addressed these concerns about increasing vegetative height and shrub structure on the uplands and the impact on fire management. However, it was ignored.

The roadless policies all severely restrict fire suppression and control by restricting access.

Those same policies and regulations also hamper grazing associations' efforts to control and eradicate noxious weeds, which can be a problem on the National Grasslands if not properly managed. (Association, Bismarck, ND - #A30187.30560)

Several actions are available for management of healthy forests: prescribed burning, limited grazing (proper charges should be levied against ranchers for this to help offset Forestry Service Costs) and even logging of diseased or dead trees can be used for this purpose. These actions must be balanced based on the health of the land, not the pocketbook of the interested parties. (Individual, Boulder, CO - #A5288.30100)

We believe the rules must be flexible enough to allow road building in areas so excess vegetation can be mechanically treated or to mange fires once they state. In addition, the agency has failed to consider the use of livestock as a means to control vegetation. Livestock have proven effective in controlling vegetation. Any new rules for roadless area should consider how we compensate our ranching families who can help protect this tremendous resources, (Association, Sacramento, CA - #A23478.30500)

Grazing cattle on the forest cuts down on the risk of forest fires. The cattle get rid of the dead grass and overgrowth that could be fuel for fires. (Individual, Manti, UT - #A20336.30560)

The lands need to be managed with excellent data on long term affect and renewal of these lands, wildlife and present use. We have already seen to many pendulum swings from one group to another. The Idea that all fires are bad is an example. Fire is part of a healthy forest and forest renewal. We get horrible fires because they have been prevented them for so long and limited grazing thus allowing deadfall and dead grass to build up. These could be avoided by responsible grazing, controlled burns and wildlife management. It is well known that hoof action on meadows and grazing renews meadows and keeps them alive. Without animals the meadow dies. Ranches are not the enemy. Most realize this and do not allow their range to be over-grazed. (Individual, Oak City, UT - #A40530.30100)

1535. Public Concern: The Forest Service should control fire size and frequency on public lands to approximately that of pre-settlement conditions.

BY REDUCING FUEL LOADS THROUGH THINNING, GRAZING, AND PRESCRIBED BURNING, AND BY MAINTAINING NATURAL AND ENGINEERED FIREBREAKS

The overall goal is to reduce the cost and requirements of federal fire suppression activities on all public lands, including roadless areas, while also reducing the risk of suffering a catastrophic fire. With this goal in mind and with the exception of urban interface lands, land management agencies should be required to control fire size and frequency on public lands to approximately that of pre-settlement conditions. This goal can be accomplished by reducing fuel loads through thinning, grazing and prescribed burning, and by maintaining natural and engineered firebreaks. Considering how this might apply to roadless areas in Nevada, resources might be focused on managing invasive weeds (i.e., cheat grass), reducing the density of invasive juniper stands, reducing the density of dry forage, and identifying and improving the quality of natural fire breaks. (Elected Official, Eureka County, NV - #A20741.30500)

1536. Public Concern: The Forest Service should reduce fire hazards.

BY EMPLOYING YOUNG PEOPLE

This need for fuel unloading where fire has previously been suppressed, offers a wonderful opportunity to provide lots of jobs for our young people that will help them to develop and maintain discipline and strong healthy bodies. So much hard work on the hazardous fuel loading that has resulted where fire was

suppressed needs to be done making the forest ready for the natural reintroduction of the fire regimes of the various areas. No roads or heavy equipment are needed for this, and the huge amount of money fighting fires could be used instead more and more for this as catastrophic wildfires consequently would diminish. This would be a much better bargain in terms of dollars spent, the health of the forest, and of the people participating.

The California Conservation Corps is a good example of such a cadre. When allowed to remain in, or once returned to their wild stage, fire and insects will no longer pose such large and grave dangers. This was recently born out by a huge fire nearby in a Wilderness which was a 'good burn' and only in areas which were back-burned was the fire hot and destructive. (Individual, Saint Paul, MN - #A19042.30410)

BY ACTIVELY MANAGING TO REDUCE FIRE HAZARDS

We should continue to be involved in the management so we do not have a forest that looks like Yellowstone. That is beautiful country and it is a shame that the timber that was lost by fire is not used for fire wood or a milling process that could produce lumber and clean up which will help the new growth and bring that forest back quicker then to let the wood turn into dirt. Bottom line is that the forest will change we need to manage it to provide the best output for the forest and again benefit the economy and put people to work. (Individual, Elko, NV - #A4853.30300)

With regard to federally-owned forests, a joint industry-government scheme should be developed to allow some road building and maintenance, harvesting of recently fallen trees, and cutting of mature growth. This would reduce the amount of fuel in the forests so that fires could be localized. It would help revitalize the economy in areas depressed by government prohibitions on lumbering, and would further restore woodlands where fallen trees are infested by insects. Overgrown forests fed the devastating fires at Los Alamos and throughout the West that may cost over $500 million. (Individual, Peachtree City, GA - #A402.30410)

What they are not doing well is keeping the federal lands in these areas clear of hazard fuels. I have often asked why they do not. One answer has been that it is the fault of the environmentalists-that the fallen dead trees must remain to provide habitat. The other answer I have heard (from a FS employee, management), unique to our area, is that because there is a proposal to build a ski resort here, the FS cannot clean up the forests in the area because that forest activity would add to the cumulative effects which might prevent the development of the resort. Thus, our lives and properties are at risk for the sake of a resort which might or might not be built and which many locals do not want. We need action, not excuses. (Individual, Klamath Falls, OR - #A5118.30510)

BY DEVELOPING A FIRE MANAGEMENT PLAN

Green forests where fires have been suppressed for long periods do provide more fuel for future blazes. Yet a "let it burn" policy isn't practical in a nation where the deepest point of wilderness is no more than 30 miles from a road. Growth within and surrounding our national forests requires maintaining a wise fire control policy that takes into consideration forest health, climate patterns (both long and short term), forest type (i.e., dry lodgepole vs. wet cedar), best containment, and after-the-fact management. (Individual, West Yellowstone, MT - #A1045.30400)

Direct the Forest Service to create fire management plans for National forests. Fuels reduction monies should be used for fire planning and preparedness. Fire management plans would enable land managers to allow certain remote wildland areas to burn under carefully prescribed conditions to maximize ecological benefits. Such plans would encourage the agency to manage fires at a reasonable cost, while prioritizing firefighter safety and protection of natural resources. (Individual, Davis, CA - #A6615.30410)

BY ALLOWING THE CLEARING OF UNDERBRUSH DURING THE INTERIM

It stalls a process that is absolutely necessary if we are to save our forests, the wildlife within it, and the millions of Americans who depend on well managed forests to ensure their properties are not destroyed, and cannot afford delay in clearing out the underbrush to reduce fires. This work could be done RIGHT

NOW since the existing rule fully allows for such clearing. The rule was finalized after extensive input from experts on wildfire, who explained that "roading" and "clearcut" logging actually increase the likelihood and severity of these events. (Individual, Olympia, WA - #A5377.30100)

BY ALLOWING MANY SMALL BURNS

The most catastrophic fires are not natural events but are caused by people, especially large-scale logging and tree plantations that screw up the age distribution, so reducing conventional logging and plantations is the first priority. Learn from the Indians and Nature, who did lots of small burns, resulting in a mosaic with low brush loads that is highly resistant to catastrophic fires. The more relevant unasked question is, how should communities be protected from unnatural events such as landslides, erosion, sedimentation, water quality degradation, habitat damage, poisons, and loss of fishing livelihoods, all caused by conventional logging and mining? (Individual, Oakland, CA - #A28134.30100)

BY CLEARING FUEL IN AREAS 40-100 METERS SURROUNDING COMMUNITIES

The current proposed Roadless policy allows roads to be built in roadless areas to protect life or property. All the current research points to the areas within the first 40-100 meters surrounding a community as the place where clearing to prevent fires should be concentrated. (Individual, Davis, CA - #A11711.30400)

IN ALREADY ROADED AND ACCESSIBLE AREAS ADJACENT TO ROADLESS AREAS

The fire occurrence data in DEIS, Vol I, 3-157, states that larger and more frequent fires occur outside roadless areas. In fact, it states that a human-ignited wildland fire is nearly four times as likely to occur outside of a roadless area. Given this information, I would suggest that roadless areas would best be protected by implementing husbandry prescriptions and fuel load reduction treatments deemed appropriate by the Forest and District on already roaded and accessible areas adjacent to roadless areas. The FS would use its already existing fire prevention and suppression plan as well. (Individual, Klamath Falls, OR - #A4970.30500)

BECAUSE FIRES OFTEN DO MORE HARM THAN GOOD

FIRES: Yellowstone Park after the 1988 fire! They said it was good for it to burn, but it is good only for just a few years. The new trees will get tall, shade the grass and the grass will die. The dead trees will fall down and it will be hard for the animal to get through, leaving lots of fuel close to the ground. When the next fire goes through, it will get the ground so hot, it will sterilize it. Then trees may not grow back for years. If it takes a long time to grow back, erosion will take place. (Individual, Bonner, MT - #A958.30300)

1537. Public Concern: The Forest Service should use prescribed burning techniques as a tool to reduce fire danger.

Given the limited logging, roadbuilding, fire suppression, and other management that has occurred within roadless areas, the fire regimes within roadless areas are still largely within natural patterns. Hence, little fuel reduction should be necessary. As small diameter fuels (less than 3 inches in diameter) are the primary vector of fire spread, these fuels can be effectively treated with prescribed fire if deemed necessary. As prescribed fire may differ markedly from natural fire, the impacts of prescribed fire should be thoroughly considered (Tiedemann et al 2000). (Organization, Missoula, MT - #A613.3420)

This lesser alteration in IRAs often results in lesser fire intensity, According to the Interior Columbia Basin Assessment:

Frost (1999) outlines the characteristics of roadless areas that may result in prescribed burning being appropriate:

Nevertheless, there are numerous roadless areas in various parts of the country that could legitimately benefit from proactive fire/fuels management using prescribed fire. What is needed are: 1) a standardized set of guidelines for identifying and prioritizing roadless areas based on their fire hazard and risk at the national or regional level, and 2) a subsequent step down process for planning fire

treatments at the local level that allow fire to play a much more important role while at the same time minimizing risks to ecological values.

Development of a comprehensive set of criteria for prioritizing roadless areas for prescribed fire treatments is largely beyond the scope of this paper. However, the following list of roadless area attributes provides an initial starting point:

- majority of area covered by dry forest types that historically were characterized by low intensity/high frequency fire regimes.

- high levels of horizontal and vertical continuity of fuels across large, contiguous areas (e.g. high stand densities and/or highly flammable fuel loads).

- long interval since last major fire (e.g. missed more than two severe natural fire cycles).

- topographic and elevational homogeneity (e.g. gentle terrain), where fire fighting efforts have more likely influenced fire behavior and also allow for relatively low-risk fire treatments.

- absence of significant natural barriers to the spread of fire (e.g. rocky terrain, non-forested vegetation, waterways, etc.)

- close proximity to the wildland-rural interface, major population centers, transportation routes, residential developments and other infrastructure (where fire risk is high) absence or low density of threatened (Organization, Missoula, MT - #A613.30420)

IN AREAS OUTSIDE OF WILDERNESS OR ROADLESS AREAS

We already have a let burn policy for wilderness areas - may we not extend that to roadless areas, where conditions permit? In other areas, why not implement burn programs, guided by foresters and scientists to achieve a desired future condition? Where necessary (feasible) firebreak swathes (not roads) could provide suppression opportunities. (Individual, Craig, AK - #A778.30400)

IN LATE FALL

I strongly support prescribed burns done in very late fall, the huge fire in New Mexico proved that timing is essential in doing the burns without destroying a forest. (Individual, Boise, ID - #A64.30420)

Prescribed fire to reduce fuel loads is the only practical answer. I first experienced the results of “let burn” and “loose herding” in 1979 on the Galligher Peak and Mortar Creek fires. Both became expensive disasters. Since then I have seen several similar situations including Yellowstone in 1988. My best recommendation is prescribed fire in the fall when winter has a chance of preventing a catastrophe and be prepared to face the consequences when it does not work as planned. (Individual, Moscow, ID - #A5380.30420)

IN FORESTS WHICH BORDER COMMUNITIES

Forestland bordering communities and subdivisions should offer periodic prescribed (controlled) burns, emphasize local education to encourage ground cleaning and brushing around homes. (Individual, Bayfield, CO - #A13395.30400)

EVERY FOUR TO FIVE YEARS

I believe that small burns should be performed every 4 to 5 years to keep the forests healthy and the fuels low. Now that many of the large fuel supplies were burnt, the time is right to keep up with the prescribed burning practice. (Individual, Boise, ID - #A209.30420)

AT LOW-RISK TIMES OF THE YEAR

The best way to maintain healthy wild forests is to keep them roadless, which allows natural processes to proceed. A century of aggressive fire suppression has resulted in a serious build-up of fuel in many parts of the West. But cutting down all the trees is like cutting off the nose to spite the face. Prescribed burns at low-risk periods of the year would help to reduce the build-up of fuels without destroying the forests that the curative methods are supposed to protect. The Forest Service’s own figures show that less than 2% of the inventoried roadless areas are at risk for insects, disease or fire. Recent studies have also demonstrated that most of the fires start in developed areas, not in the roadless areas. (Individual, Seattle, WA - #A17841.30100)

WITH GUIDELINES ESTABLISHED IN THE FOREST PLANNING PROCESS

Prescribed fire for forest health, fuel reduction and wildlife should be allowed. Guidelines should be decided at the forest plan level. (State Agency, Social Circle, GA - #A22054.30420)

ONLY AFTER PREVENTATIVE STEPS TO REDUCE FUEL LOADS ARE TAKEN, SUCH AS HARVESTING, THINNING, AND GRAZING

Forests should be harvested, grazed, and thinned to keep the fuel load in check. Prescribed burning can be done ONLY after those fire-preventative steps are taken. Site-specific clearcutting should be used to prevent the spread of insect infestation or disease. "Inventoried" roadless areas should be "opened" to access to take those necessary steps. In many areas that I am familiar with, logging companies must "close" their roads after a timber sale, which includes cutting water-bars and seeding grasses to prevent erosion. (Organization, Three Rivers, CA - #A28739.30200)

TO REDUCE THE ECOLOGICAL IMPACTS OF FIRES AND FIREFIGHTING

For the prevention of insect and disease outbreaks, to minimize the impact of these outbreaks, and to reduce the potential for large-scale wildfires, the best option is prescribed burning. Rather than spending money building roads so that privately owned timer companies can profit off of national timber, use the money to hire ground crews to burn the forest bit by bit. The only way to limit fuel buildup is to burn periodically. Simply removing the smaller trees won't work because brush will still accumulate without them. Burning will also keep both endemic and epidemic pest and disease outbreaks to a minimum. You don't need roads and fire breaks to prevent fires. You need people setting many small-scale, prescribed fires under appropriate weather conditions. Fires are inevitable. Preventing fires is no justification to fragment millions of acres of habitat unnecessarily with superfluous roads.

Another reason to implement the proposed roadless rule is that fighting fires also causes ecological disturbances. Bulldozed firebreaks can lead to erosions, invasive foreign weeds can take hold there, wetlands are destroyed, and fire retardant dropped from airplanes can harm frogs and other amphibians. So, fighting the fires doesn't work, and suppressing the fires doesn't work, so prevent the fires by designing a prescribed burning scheme, hire adequate, experienced staff to carry it out, and implement it. That will result in significantly fewer large-scale wildfires and the taxpayers will probably save money in the long-run from the decrease in the exorbitant costs associated with fighting fires.

It is important to note that as of August 30, 2001, only 1/7 (14%) of all lands burned this spring and summer were part of the National Forest System. Therefore, the Forest Service should have fought only 14% of all fires this year. This compares with the figures for the last 5 years that less than 1/5 (20%) of all land burned in the Western United States was in National Forests. Being that such a small percentage of the fires actually occur on federal property, fire is clearly not the widespread problem that the media is making it out to be. With an adequate prescribed burning regime in place and staff to carry it out, the fire issue should be relatively minor, rendering the notion that we have to cut the forests to prevent fires and pest outbreaks moot, as it ought to be. (Individual, No Address - #A29243.30100)

USE TECHNIQUES THAT ADHERE TO LOCAL FIRE MANAGEMENT PLANS AND THAT CONTAIN MONITORING PROVISIONS TO ASSESS THE USEFULNESS OF THE BURNS

We support active management of roadless areas in the form of carefully designed prescribed burns that adhere to local fire management plans, and that contain monitoring provisions to assess the usefulness of the burns. (Organization, Seattle, WA - #A21694.30100)

1538. Public Concern: The Forest Service should carry out controlled burns.

TO MANAGE FOREST HEALTH

Insect outbreaks are part of a natural cycle in many forest systems. In systems where natural fire regimes are still operating, low to moderate intensity fire can itself help prevent or lessen the impact of insect outbreaks. By reducing the number of younger trees, thereby decreasing drought stress, some forest communities can both reduce catastrophic fires and the frequency and severity of insect infestations. Using controlled fire and developing appropriate let-burn policies for roadless areas should be the preferred ways to manage for forest health. (Individual, Seattle, WA - #A11805.31200)

IN STRIPS OF FOREST THAT HAVE PREVIOUSLY BEEN HARVESTED, SIMILAR TO A CROP ROTATION MANAGEMENT ACTIVITY

During this summer's season of wildfires, there is talk of controlled burns to burn up years' worth of accumulated brush and wood fuels which make massive wildfires more likely. Given that fighting these massive wildfires is very expensive, why not compromise with controlled burns in strips that have first been logged, giving the loggers the job of gathering unwanted fuels in piles to burn in lieu of buying the timber. These strips then become firebreaks against future wildfires. As these strips regenerate, other strips can be similarly harvested, etc. such that over time a healthy forest results somewhat like the beneficial effects of crop rotation on a farm. This is just one idea. There must be many sensible formulas such that man, with roads, can save the forests. Man can best protect the forest environment through involvement, not deliberate neglect. (Individual, Leamington, UT - #A8030.30531)

IN AREAS WHERE FIRES HAVE BEEN ARTIFICIALLY SUPPRESSED

Protecting forests means allowing fire to work its natural role. Controlled burns should be planned where fires have been artificially suppressed. (Individual, Seattle, WA - #A17999.30310)

IN AREAS WHERE THE RISK FOR EXTREME TEMPERATURES AND INTENSIVE VOLUMES OF SMOKE HAVE BEEN ADDRESSED

In the case of forests, we have been waging a divisive discussion for many years between philosophies of fighting fire [or "lighting fire"]. Reduction of fuels is a must. Start with the least invasive tools first, and proceed to controlled burning when the risk for extreme temperatures and intensive volumes of smoke have been addressed. (Individual, Elko, NV - #A23651.30500)

WHERE POSSIBLE, OTHERWISE THIN TIMBER WITHOUT BUILDING NEW ROADS

As [is] pretty generally known, most forest areas in the western USA (some coastal forests being a partial exception) have naturally coexisted with low-intensity fire for millennia. Fire has controlled fuel buildup, moderated insect and disease problems, etc. Fire control over the last century has created fuel buildups, and encouraged insect and disease problems. Where possible, the obvious solution is the use of intelligent "controlled burning". Where this is, for whatever reason (such as proximity to roadless area borders) not possible, mechanical thinning should only be considered if it can be done without the building of roads, and in a way which replicates as nearly as possible the effect of low intensity fire (e.g., preserving larger trees, recycling nutrients). I believe the rules under suspension are quite consistent with these principles. (Individual, Seattle, WA - #A17261.30400)

Protecting Forests: Controlled burns and other management approaches can be executed without the building of new roads into existing roadless areas. (Individual, No Address - #A26689.30100)

1539. Public Concern: The Forest Service should construct firebreaks.

Adequate "Fire Breaks" should be established to ensure the fires can be contained in a reasonable area. (Individual, Tucson, AZ - #A4540.30400)

ONLY IF REALLY NECESSARY

I support a roadless policy that allows for fire lanes to be dug *if necessary only* - that is, if winds and drought/weather conditions suggest that fire left uncontrolled will spread to populated or popular recreational regions. The Forest Service should determine necessity realistically - will throwing out a shovel brigade really stop this blaze, or is the act one of futility? (Individual, West Yellowstone, MT - #A1045.30600)

BY USING ROADS AS FIREBREAKS

Roads are important fire breaks. They allow fires to burn out rather than consume an area. They allow us to fight the fire if called for. (Individual, No Address - #A6738.30540)

BY DECOMMISSIONING SOME ROADS AND MANAGING THE REMAINING AS A DEFENSIBLE PERIMETER AGAINST WILDLAND FIRE

The existing road system is expensive and unsustainable. The process should consider which roads can be decommissioned, and how to manage the remaining roads as a defensible perimeter against wildland fire. Pulpwood thinning of the settled areas near remaining roaded areas is the best way to restore ecological processes which naturally limit fire hazard. (Individual, No Address - #A4777.30500)

BY CLEARING DEAD TIMBER AND THINNING STANDS NEXT TO PRIVATE PROPERTY TO AN APPROPRIATE WIDTH

I have a suggestion only on the problem of wildfires and fires started outside the National Forest. I grew up right after WW II in a small village in the Black Forest of Germany. When I was 5, my mother took me into the forest and we made bundles of branches for kindling. We were not alone. Everybody did it. The forest floor was clean, no dead wood, like the immediate surroundings of a popular camping place in the woods here in this country. My suggestion is to clear dead wood and thin the stand of forest next to communities and private property to a depth that will constitute an effective fire break. You should employ for that task the many unemployed loggers and others that typically are found around the Klamath National Forest. (Individual, No Address - #A5286.30500)

BY CREATING A BOUNDARY AROUND ROADLESS AREAS WITH MULTIPLE USE, MOTORIZED TRAILS

Inventoried roadless areas are subject to the greatest threat of wildfires and insect and disease outbreaks due to their limited accessibility. I would suggest that all such areas are boundaried by multiple use, motorized trails. This would create a firebreak immediately, and also allow for easier access to keep an eye on the health of the forest. As far as the buildup of hazardous fuels, allow citizens to collect firewood from these established border trails to further promote the cleanup of the fuels and help to maintain the firebreaks. (Organization, No Address - #A26800.30100)

BY MAINTAINING FIRE LANES BUT CLOSING THEM TO ALL BUT FOOT TRAFFIC

I believe fire lanes must be available and maintained but closed to all but foot traffic. (Individual, Stewartstown, PA - #A7563.90110)

BY ENCOURAGING VOLUNTEERS TO ASSIST WITH FIRE BREAK MAINTENANCE

Not the least of these effects is that wildfires are fought with much lowered effectiveness without proper access for fire crews. Clearly, the Forest Service does not have the resources to maintain millions of miles of firebreaks if the support of recreational users is denied. Roads SAVE wilderness!! (Individual, Ypsilanti, MI - #A9112.30200)

OUTSIDE OF ROADLESS AREAS

If firebreaks are required, they should be constructed outside the roadless areas. (Individual, No Address - #A30493.30540)

1540. Public Concern: The Forest Service should allow ski areas located on the fringes of roadless areas to help provide defense zones.

WHICH ALLOW FOR DEVELOPMENT WHILE DECREASING FUEL LOADS

It is the local Forest supervisor who is in charge of protecting the particular forest. Activities and planning actions must therefore occur at the local level. There are several management practices that would provide for healthy forests, especially related to the buildup of hazardous fuels and the occurrence of severe wildfires. One such technique is to allow the ski areas located on the fringes of roadless areas to help provide defense zones that allow for development while decreasing the fuel loads. The vegetative treatments in the ski areas have created a defendable space resulting in interruption of fire spread and reduction of fire intensity. (Permit Holder, Mammoth Lakes, CA - #A21901.12125)

1541. Public Concern: The Forest Service should maintain existing fire trails.

IN THE SHAWNEE NATIONAL FOREST

In Illinois in Shawnee National Forest please maintain existing fire trails also. (Individual, Decatur, IL - #A11052.30200)

1542. Public Concern: The Forest Service should suppress forest fires.

Protecting Forests is something you know nothing about, or the LET BURN POLICY IN YELLOWSTONE would never have been followed. First put fires out as soon as possible before they get out of control. (Individual, Ogden, UT - #A280.30320)

Forests and communities should be protected from fire by adequate access to control the fires before they reach uncontrollable size. Go back to the Smokey Bear days when all fires were controlled at the shortest possible time and small size. (Individual, Payette, ID - #A1049.30400)

We are now suffering a bad wildfire in our own back yard due to careless campers and are told by the "enviro" part-timer in our neighborhood . . . "just let it burn" . . . why, for pete sakes? What good does it do to lose thousands of dollars worth of inventory (lumber) and food for animals (deer, bear, and whatever and even mice!) and maybe giving our neighbor, Canada, the world's biggest forest fire? How many lost head of livestock and human lives do you "work into your 'let it burn' agenda before you see reality?" People pay fees to graze livestock and that is lost revenue, also. (Individual, Mazama, WA - #A757.30430)

Obviously "roadless areas" prevent any detection or possible abatement of fuel buildup, insect or disease outbreaks and severe wildfires. Wildfires should not be considered a "natural" remedy for any of the above. The temperatures at which they burn sterilize huge amounts of otherwise productive and scenic land to say nothing of the absorption of carbon monoxide and production of oxygen. Once these lands are destroyed by fire, the very necessity of human life is extinguished with the fire. (Individual, Three Forks, MT - #A697.30200)

BECAUSE LETTING FORESTS BURN IS NOT RESPONSIBLE LAND MANAGEMENT

Allowing millions of acres to burn is not "responsible" environmentalism because:

1. The smoke pollutes the air
2. With winter snow and rain, streams become polluted because of soil erosion
3. Wildlife is displaced or killed
4. Much timber is ruined even for salvage logging. (Individual, Rocklin, CA - #A6215.30100)

BY USING CHEMICALS TO EXTINGUISH FIRES

Carbon dioxide as in the case of Nevada and other states can even cause fires. Lighting storms, especially dry lighting can tear a forest up real quick. Yet in many areas we're prevented from utilizing chemicals to extinguish fires, as if the smoke the fire creates is more environmentally friendly. (Individual, Jefferson, OR - #A775.30400)

BY ALLOWING FIRES TO BURN TO A CERTAIN LANDSCAPE FEATURE BEFORE SUPPRESSING THEM

A century of fire suppression has made roadless (and other) forests unhealthy. Enormous fuels have accumulated. The Forest Service should consider procedures used in some national parks of fire management that allows fires up to a certain point - a drainage, to a ridge, etc., before suppression. Fire plans in roadless areas should be designed to reintroduce a natural mosaic of different stand age classes across the landscape as the prime objective, rather than mere suppression. (Individual, Lolo, MT - #A111.30400)

BY ENLISTING MILITARY AIRCRAFT CONVERTED INTO WATER TANKERS AS A SUPPRESSION TOOL

To help minimize the destruction of State and Federal Forests due to wildfires, I propose the following solution. Re-activate a wing of the now decommissioned B-52s, converting them into water tankers that would be strategically stationed in airstrips across the United States. These planes and their water would be available to any State or Federal forest fire in the country on a moment's notice. The United States Armed Forces or each individual State's National Guard could man the planes. The "bombing runs" or water drops would simulate combat conditions for the pilots. Minimizing the loss of grasslands and forests and giving our military personnel much needed experience, under less than ideal conditions. (Individual, Kamiah, ID - #A5419.30400)

How many cargo planes does the US armed services have? Many. What if a water tank were made for 9,000 of them? Some could even take on water by skimming the great lakes, oceans, etc. What if 9,000 cargo planes, 1 mile apart, dumped oceans of water on a wildfire, first light until dark, dark until first light. Non stop. Non stop. I say the blasted fire would be put out!!! Then they could put out the other one and all of them fast. (Individual, Jackson, MI - #A7273.30400)

1543. Public Concern: The Forest Service should concentrate firefighting efforts in urban-forest interface areas.

BECAUSE THESE AREAS ARE ALREADY ROADED AND POSE THE GREATEST THREAT TO LIFE AND PERSONAL PROPERTY

Wild fires are much more likely to start in areas with roads, due to increased public access. The highest risk of wildfires is in the urban interface, where homes and private property run a high-risk of destruction. Incidentally, in the state of Washington, a spark from a vehicle engine in a roaded, logging induced, fuel-heavy forest, caused one of the two most devastating fires in recent times. The Forest Service should concentrate its fire fighting efforts in those areas, which are already well supplied with roads and pose the greatest threat to life and personal property. (Organization, Seattle, WA - #A21702.30200)

The agency should make clear that access to roadless areas to prevent or address forest fires, fuels buildup, insect or disease outbreaks or other urgent priorities will require management flexibility and that exceptions to a roadbuilding ban are needed for such access. More intensive forest fire prevention activities should be allowed in roadless areas near or adjacent to urban interfaces, private lands or other public lands, such as ski areas, where there has been extensive investment of private capital in improvements that could be threatened by severe wildfires. Any national directives on roadless area management should contain an explicit exemption for activities in roadless areas needed to prevent or address forest fires, fuels buildup, insect or disease outbreaks, or other safety issues. (Permit Holder, Denver, CO - #A15385.30200)

1544. Public Concern: The Forest Service should enlist prisoners to clean up dead and dying timber and brush and to construct and maintain trails.

MATERIALS COLLECTED COULD BE USED TO OPERATE A CO-GENERATION POWER PLANT

We expect our military personnel to live in whatever kind of conditions that the situation requires. Yet, we let our national criminals live in better conditions and with more benefits than our military and most of the civilian population of the United States. With that in mind, why couldn't we take the majority of our able-bodied State and Federal nonviolent offenders and place them in a so called "CCC" camp. Whose responsibility it would be to go through, literally picking and cleaning up all of the dead and dying combustible material, from all of our State and Federal lands. However, this "CCC" camp would also include the responsibilities of building and maintaining the forest trails for everyone's enjoyment. They would live in conditions that were no worse than those that we expect our military men and women to live in without complaint.

This combustible material could then be used as fuel in a Co-Generation power plant. This would help to alleviate the present and future energy shortages of the United States of America. With the available

technology, the emissions of the Co-Generation power plant would be minimal, eliminating any environmental concerns. (Individual, Kamiah, ID - #A5419.30500)

I think that prisoners from state pens should be utilized to clean out underbrush, so that the forest fires would be less. (Individual, Harrisonburg, OR - #A19453.30600)

1545. Public Concern: The Forest Service should specify the criteria under which the Roadless Area Conservation Rule exceptions would apply.

FOR MANAGEMENT ACTIVITIES TO REDUCE THE THREAT OF WILDFIRE

The Forest Service should make clear that under some circumstances healthy forests might be subject to wildfires, even severe ones, and build up of fuel loads. This would be an appropriate discussion in regional assessments or Analysis of Management Situation conducted as part of a Forest plan revision. The current roadless area conservation rule allows for management activities to reduce threats from wildfires. The language in the current rule allows for:

(1) The cutting, sale, or removal of generally small diameter timber is needed for one of the following purposes and will maintain or improve one or more of the roadless area characteristics as defined in #A294.11.ii. To maintain or restore the characteristics of ecosystem composition and structure, such as to reduce the risk of uncharacteristic wildfire effects, within the range of variability that would be expected to occur under natural disturbance regimes of the current climatic period.

We suggest that it is the role of Forest Plan revision to specify, to the extent possible, in which roadless areas this exception would apply and the thresholds that would trigger these management activities. It would be expected that these thresholds would be different for various units identified via GIS analysis. (Individual, Asheville, NC - #A22623.30410)

The prior Roadless Rule policy allowed for some road construction and some logging in roadless areas when faced with an imminent threat to public and health and safety, and allows hazardous fuels treatments within roadless areas. The Commission supports the reservation of this level of active management for the occasions presenting a true hazard to life or property, or risk of *catastrophic* fire. We are concerned, however, that this exception will be taken advantage of and used to allow logging and road construction for ulterior motives where risks are only slight. For this reason, exceptions must be stated narrowly and explicitly. (Executive Director, Inter-Tribal Fish Commission, Portland, OR - #A20331.30400)

Ecosystem/Restoration Management

1546. Public Concern: The Forest Service should acknowledge that wildfire is a component of a healthy forest.

Regarding the management of inventoried roadless areas to provide for healthy forests, the Forest Service should make clear that under some circumstances healthy forests might be subject to wildfires - even severe - and build up of fuel loads. This would be an appropriate discussion in regional assessments or analysis of management situation conducted as part of a Forest plan revision. (Civic Group, Roanoke, VA - #A1713.30300)

The Forest Service should try to get over its aversion to fire. It's not a disaster—it's a natural process; fire enhances habitat for deer, elk, and other wildlife recycles nutrients, etc. Many Forest Service employees know this, but the agency can't seem to avoid a knee-jerk anti-fire position. (Individual, Missoula, MT - #A90.30300)

Fire plays a vital role in western forest and rangeland ecosystems. As a natural disturbance agent responsible for recycling nutrients, regenerating plants, and sustaining diverse wildlife habitats, fire is necessary for the continued productivity of these ecosystems. Certainly, efforts should be made to

protect communities in the urban/wildland interface zone, defined as the area "where combustible homes meet combustible vegetation." But pouring taxpayer dollars into suppressing fires and logging in roadless forests located far from residents makes little sense. (Organization, Nevada City, CA - #A4941.30300)

1547. Public Concern: The Forest Service should not suppress forest fires.

BECAUSE NATURAL FIRE MAINTAINS DIVERSE FORESTS AND WILDLIFE HABITAT

Five years ago, I published several studies of fire ecology of a roadless area. My findings from the Northern Rockies indicated that large roadless areas can be important for facilitating fire as a natural and important process in maintaining diverse forests and wildlife habitats. By limiting human-caused ignitions, structures and other developments, fire management can actually be less challenging in these areas. There are many other virtues of large roadless areas such as water quality, solitude, wildlife refugia, and so on. The Forest Service's Interior Columbia Basin Assessment further stresses the ecological integrity and value of these areas. (Individual, Portland, OR - #A3912.30300)

We believe that the long-term management strategy for both fire prevention and forest health needs to incorporate a natural fire element. (Organization, Seattle, WA - #A21904.30430)

BECAUSE FIRE REJUVENATES ECOSYSTEMS

Current threats to the health of our nation's forests can almost without exception be traced to poor past management practices. The decades long effort to suppress forest fires has led directly to the "tinder box" we now face. There is however a clear and timely demonstration of the best response to naturally occurring forest fires - let them burn. The fires in Yellowstone in 1988 have led to a widespread rejuvenation of that Park's ecosystem. (Individual, Green Valley, AZ - #A5089.30300)

BECAUSE NATURAL FIRE REGIMES SHOULD BE RESTORED

Fire hazards are invariably more severe where selective logging and fire suppression have led to the buildup of a brushy understory of fire-prone species like white fir. The Forest Service should move further in the direction of restoring natural fire regimes, with less aerial suppression of fires in roadless areas, and a greater concentration on prophylactic measures within a perimeter defined by a reduced road system. (Individual, No Address - #A4777.30310)

Wildfire suppression should be similar to that already followed on wildlands in Alaska. Naturally occurring fires should be left to burn unless threatening towns. Wildfires are not a big issue in much of coastal Alaska's forests. (Individual, Seldovia, AK - #A8803.30400)

BECAUSE FIREFIGHTING IS A WASTE OF MONEY, DANGEROUS, AND HARMS THE ENVIRONMENT

Roadless areas and other designated wildernesses should be left to burn under natural conditions. Fighting fires in remote areas is a waste of money, is too dangerous, and does more harm than good to the environment. (Individual, Lehi, UT - #A568.30400)

BECAUSE DEAD TIMBER IS A CRITICAL PART OF THE FOREST ECOSYSTEM

Management should be left to natural processes whenever possible. Fire management should only be done near inhabited areas, if at all. Deadwood is a critical part of the forest ecosystem, and should be allowed to exist. (Individual, Winthrop, WA - #A19642.30310)

EXCEPT IN THE EVENT OF INSECT OR DISEASE INFESTATION THAT IS UNCONTROLLABLE BY NATURAL MEANS

Fire suppression should stop completely, except in the event of insect or disease infestation that is uncontrollable by natural means. (Individual, New Haven, CT - #A8987.30910)

EXCEPT IN THE EVENT IT IS NOT POSSIBLE TO CONTROL THE FIRE, THEN RELY ON MORE AIR-POWER

Keep them roadless, thus avoiding some of the problems (such as fire) that are intensified by roads. Fires have been controlled in these areas in the past, and can continue to be controlled. (Most roadless-area fires should be left to burn. Where that is not possible, much heavier reliance on massive air-power than

has been practiced would greatly improve fire control.) Insect and disease outbreaks are part of the natural forest cycle and should be left alone in roadless areas. (Individual, Santa Fe, NM - #A11703.30100)

EXCEPT IN THE EVENT THE FIRE IS HUMAN INDUCED

As for fire concerns, let natural fires burn, fight human started ones. We may have some huge fires due to the history of forest mismanagement in the short run, but after awhile the forests' natural fire responsibilities will resume. (Individual, No Address - #A21323.30310)

IN REMOTE AREAS

The FS needs to develop fire plans right away for roadless areas which will allow most wildfires to burn when not threatening human lives or property. Suppressing wildfires in remote areas is ridiculous, expensive, and counter productive. (Individual, Idaho Falls, ID - #A27528.30400)

The vast majority of roadless areas are in inaccessible areas, mostly at higher elevations. These forests do not need to be protected from wildfire. Higher elevation forests usually have stand-replacement fire regimes. These are typified by "severe" wildfires that occur every century or more. Fire suppression has not been occurring for long enough to result in any kind of "unnatural" fuel buildup in these forests. There is no reason to be fighting fires in these areas, and there is no evidence that either roads or silvicultural thinning would help us fight fires there if we wanted to do so. Nor do forests need to be protected from insect outbreaks, as these are also natural occurrences. The best way to protect forest health in roadless areas is to prevent the construction of roads. Roads have profound negative impacts on wild lands. They fragment habitats, cause erosion, and rapidly promote the spread of invasive weeds. (Professional Society, Missoula, MT - #A29308.30100)

The Roadless Rule already provides exceptions that allow road building and logging when needed to address wildfire concerns. Because roadless areas are typically located far from communities and residences, wildfires in roadless areas pose relatively little risk. This is especially tree in Alaska's two national forests. (Organization, Sitka, AK - #A30486.30100)

The greatest fuel loading and fire hazard areas and areas closest to homes should get highest priority. Roadless areas are often the furthest from residences (since there are no roads in these areas). There is already a Forest Service program to let fire burn in wilderness when private property and commercial timber outside of those areas is not threatened, since it is part of the natural ecological process. Since larger trees in areas of frequent fire are often fire resistant and will survive, since these areas are furthest from civilization, they are at higher elevations, they have colder temperatures and higher humidity, fuels are not so dry, fires often do not get so large and burn themselves out more quickly, and smoke is not such a public health concern in these locations. It is more difficult and expensive to fight fire in roadless areas (no roads, further from towns, supplies, etc.). (Individual, Olympia, WA - #A20849.30400)

IN WILDERNESS AREAS

Wilderness (and not merely wilderness already contained in designated wilderness areas), however, should be allowed to burn naturally as much as possible. (Individual, Seattle, WA - #A26276.30310)

PROHIBIT FIREBREAKS AND RETARDANT DUMPING

National fires need to be allowed in Roadless wilderness without damaging fire breaks bulldozed and retardant dumping. (Individual, Talent, OR - #A23553.30300)

1548. Public Concern: The Forest Service should reintroduce fire into forest ecosystems.

The most effective fuels treatment that would both protect roadless areas from future severe fires, insect and disease outbreaks while at the same time it restores areas altered by past fire exclusion would be a program of prescribed burning and wildland fire use. Fire reintroduction has been the longstanding call among scientists, ecologists, and conservationists. It is the most ecologically beneficial and least

economically costly management treatment to manage roadless areas. It is fully in accordance with the letter and spirit of the National Fire Plan, the USFS Cohesive Strategy, the 1995 Federal Wildland Fire Management Policy, and the 2001 Review and Update of the Federal Wildland Fire Management Policy. In most cases on most roadless areas, careful fire management planning can devise the prescriptions necessary to apply both prescribed and wildland fire use for all needed fuels treatments. In contrast to road-dependent mechanical thinning treatments, roads are unnecessary for prescribed burning or wildland fire use. The economics of fire-based fuels management would thus be even more attractive since the costs of constructing and maintaining roads are moot. To burn or not to burn is really not an issue dependent on more research or policy reform—it is mainly a matter of Forest Service managers harnessing the will to make the right decisions regarding wildland fire use and prescribed burning. (Organization, Eugene, OR - #A21798.30200)

Some Roadless Wilderness areas need to have fire reintroduced gradually if the past fire suppression has created inferno type conditions, low intensity burns could be encouraged. All with proper study of the growing field of fire ecology. (Individual, Talent, OR - #A23553.30300)

Rely Principally on the Reintroduction of Fire. What has been missing from these systems is fire. Fire should be introduced through liberal application of controlled burns, and with a reduction in the suppression of natural fires. Even at that, it will take years to catch up with the backlog of built-up fuels. Meanwhile, catastrophic fires will occur. Well, let's face it. Some areas have always burned catastrophically. For the next few decades, until the built-up extra fuels are reduced, more areas than usual will burn catastrophically. In the end, this is a natural cure for an unnatural situation. Except for fires that threaten to consume a disproportionate amount of the available forest (see below), even catastrophic fires should be allowed to burn without fire suppression. In the end we will get a natural system again - free from the residue of past mismanagement. What this approach requires, of course, is humility and patience - two attributes rarely demonstrated in our national character. (Individual, Pendleton, OR - #A30482.30300)

1549. Public Concern: The Forest Service should manage fire in roadless areas following wilderness fire management policies.

BY EXTENDING THE "LET BURN" POLICY TO ROADLESS AREAS

The idea that areas established for the purpose of maintaining them in a natural condition need to be managed to protect them from natural disturbance is, with a few exceptions, misguided and unjustifiable.

Protection of roadless areas is not expected to increase either the number of large fires or the acreage burned over the next 20 years. The majority of lightning-caused fires, and the great majority of human-caused fires, occur outside of wilderness and roadless areas (FEIS, table 3-20, 3-21), and the median size of large fires is not appreciably different between inventoried roadless and roaded areas (FEIS, Table 3-22). Where feasible, fire management in roadless areas should follow wilderness fire management policies. Where "let-burn" policies are in place they should be extended to roadless areas. Aggressive fire suppression (including use of ground-based mechanized equipment) should be undertaken only when fires threaten life or property outside of roadless area boundaries.

Prescribed burning to simulate natural fire regimes (including low-impact actions to reduce fuel loading) should be allowed in roadless areas. Use of mechanized equipment for fuel suppression requiring the construction of temporary roads for access should not be allowed. More intensive proactive steps to reduce fuel loading and fire risk (including mechanized or commercial thinning) should focus on areas where there is the highest threat to human settlements and property (the wildland-urban interface). Most of these areas will be well outside inventoried roadless areas (FEIS, pg. 3-87), and their treatment is likely to occupy forest managers for several decades. Where roadless areas are in close proximity to settled areas exceptions may be made that allow more active fire risk reduction steps in roadless areas.

No actions should be taken in roadless areas to suppress natural insects, diseases or other pests. Exceptions may be made to control outbreaks of exotic pests that are not well-established in the region, and where treatment may reasonably be expected to limit the establishment of these pests. However, these instances are likely to be relatively rare. (Organization, Boston, MA - #A23083.30100)

1550. Public Concern: The Forest Service should ban the use of fire in roadless areas.

Protecting forests from fire is not totally possible, bans on fire use in these roadless forest is one way to go. Anyone caught building a fire is to be fined excessively. (Individual, Boulder, CO - #A3478.30400)

1551. Public Concern: The Forest Service should avoid artificial fires, backburning, and prescribed burning.

We should use hand clearing and avoid artificial fires and backburning which has repeatedly gotten out of control and done more damage than good. Dead and diseased trees should be removed when necessary and non invasive methods such as horse logging should be employed when possible. (Individual, Marion, NC - #A4691.30400)

Most of the forested area that burned in 2000 was managed timberland - areas that have been logged or thinned in the past - not pristine old growth or roadless wildlands! Fight fires, end prescribed burns! (Individual, Bozeman, MT - #A8444.30100)

The forest health problem cannot be ignored. Prescribed fire to reduce fuel is not a feasible program for portions of the forest which are accessible by roads; and it certainly is even less feasible in roadless areas. In the first place, prescribed fire fails to accomplish significant fuel reduction most of the time. In the second place, the federal agencies have a miserable record in controlling prescribed fire. And in the third place prescribed fire is unacceptable because of its unreasonable cost when weighed against benefit. These problems plume the smoke and its disastrous affect on human health and air quality make massive prescribed fire programs unacceptable. (Individual, Townsend, MT - #A20588.30420)

Protecting forests the same protection or even more should be provided roadless areas for they are middle ground on the forest system; highest being wilderness; second being roadless and third being open access. Whatever actions needed to protect the areas should be taken; even if it seems to violate the rules for roadless areas; ex: if a road on fire break needs to be bulldozed to fight a fire or provide for spraying or harvest of diseased tress; it should be done, better to destroy a few than let the whole area be decimated. I am totally against LET BURN and CONTROLLED-BURN policies. (Individual, Ogden, UT - #A2288.30100)

BECAUSE FORESTS IN THE SOUTHEASTERN UNITED STATES DO NOT HAVE A FUEL LOAD

The Forest Service needs to move beyond the idea that fires are bad and evil. Yes, fires are bad when they endanger lives and communities. But some fires should be allowed to burn and some forest ecosystems depend on fire to regenerate. On the other hand, the cove forests in the southeastern United States are moist forests and have a very low risk for fire. The southeastern forests don't have a "fuel load"; we have leaf litter and the leaf litter helps keep the soil moist. The moisture in our forests is what makes them so diverse. I am very discouraged to see the Forest Service doing prescription burns in the Pisgah and Cherokee National Forests. These forests are not dependant on fire. The only reason the Forest Service is burning is to reduce competition of hardwood understory trees, like non-commercial value Dogwoods. We need to spend tax-dollars to reduce the threat of wildfire in and around homes, not miles away from communities in roadless areas. (Individual, Asheville, NC - #A30306.30300)

1552. Public Concern: The Forest Service should protect roadless and roaded areas.

BY DESIGNING RESTORATION PROJECTS TO MANAGE POTENTIAL CATASTROPHIC WILDFIRES

On the Pike and San Isabel, several areas which have fire-suppressed forests in the wild-urban interface are being considered for restoration projects which would specifically deal with potential catastrophic wildfire. These projects can be designed to protect roadless and roaded areas alike within the parameters of the Rule. (Organization, Denver, CO - #A8824.30100)

1553. Public Concern: The Forest Service should allow a categorical exemption for restoring burned areas.

INCLUDING NEEDED ROAD BUILDING, SALVAGE LOGGING, SOIL PREPARATION, SEEDING, PLANTING, RIPARIAN RESTORATION, AND FOLLOW UP WORK TO HELP THE SURVIVAL OF SEEDLINGS

With fires burning in the West, and hundreds of thousands of acres needing restoration in the aftermath, one could hope for a change of public sentiment to allow for: A categorical exemption from legal challenges to needed restoration of burned over areas, including but not limited to needed road building, salvage logging, soil preparation, seeding, planting, riparian restoration, and follow up work to help the survival of seedlings. (Individual, Yreka, CA - #A17133.31100)

Other

1554. Public Concern: The Forest Service should utilize burned timber as biomass energy.

Burned timber must be utilized as Biomass energy rather than laying waste other than set aside amount of downed trees for habitat. (Individual, Jefferson, OR - #A775.31100)

Insects, Disease, and Noxious Plants

Summary

General Comments – A number of respondents comment about insects, disease, and noxious plants. One individual urges the Forest Service not to weaken the Roadless Area Conservation Rule because the Rule, this person states, will aid federal, state, and local efforts to combat the spread of noxious weeds. Likewise an organization states that "protecting roadless areas is one of the most important 'weed control' policies because of the intimate connection between roads and the spread of invasive plants." One business suggests that the Forest Service should implement standards for insect and disease control "so that an outbreak is controlled and potential usable losses are utilized before they become unsuitable;" and an association requests that the Forest Service recognize that roadless area transportation regulations and policies interfere with local grazing associations' work in controlling noxious plants.

Adequacy of Analysis – Some respondents suggest that the Forest Service should evaluate the role of insects and disease in a forest ecosystem. Others recommend insect and disease outbreaks be examined—on foot, on horseback, with the use of aircraft, with regular surveys, by enlisting aid from the public, or by establishing an entomological collection station. Several respondents suggest that the Forest Service evaluate all sources that contribute to the noxious plant problem, including roads, people, equestrians, wildlife, and natural processes. A county agency asks that the Forest Service reevaluate insect and disease risk. This agency states, "We suggest that this issue be reevaluated and specific direction be incorporated as to insect and disease response within the unroaded and roadless areas." Additionally, one individual suggests the Forest Service expand its studies of ecosystem interactions because few places are in danger of insect and disease epidemics.

Funding – Several people suggest that funding be directed to the management of insects, disease, and noxious plants. One individual states, "Funding should increase for research and development of biological means of preventing and controlling insects and disease." Another person recommends that the Forest Service reallocate money earmarked for timber removal in order to hire a staff large enough to recognize forest health problems early on. Finally, an

organization asks the Agency to acknowledge the financial contributions made by off-road vehicle users to noxious plant abatement programs.

Management – A number of respondents assert that the Forest Service should actively manage resources to control insects, diseases, and noxious plants. Suggestions include reintroducing fire, prohibiting monocultures, using chemicals and other solutions, using aerial applications, and implementing and enforcing U.S. Department of Agriculture recommended initiatives. A federal agency suggests the Forest Service concentrate its efforts in roaded areas identified as suitable for logging.

Other people urge the Forest Service to acknowledge that insects and disease are a component of a healthy ecosystem and that they play a vital role in biodiversity and nutrient recycling. Some suggest the Forest Service should control insects, disease, and noxious plants with natural remedies like species diversity and natural predators. Others state that wildfires should be allowed to destroy insects and disease. Several individuals recommend that pesticides and herbicides should not be used.

A number of respondents urge the Forest Service to only control exotic or non-native insects and diseases. According to one person, "Disease and insect outbreaks of natural origin should be allowed to run their course. More active management may be needed if the pathogens or insects are exotic species brought in by man." Additionally, several people say that the Forest Service should not use forest health as an excuse to harvest timber because it is not needed to prevent insects and disease and because insects and disease rarely rise to epidemic levels.

Insects, Disease, and Noxious Plants General

1555. Public Concern: The Forest Service should not weaken the Roadless Area Conservation Rule.

BECAUSE THE RULE WILL AID FEDERAL, STATE, AND LOCAL EFFORTS TO COMBAT THE SPREAD OF NOXIOUS WEEDS

In forest ecosystems, most noxious weeds are restricted to sites near roads, logging operations and other disturbed sites such as power line corridors. It is clear that weakening the Roadless Area policy will directly counter Federal, state, and local efforts to combat the spread of noxious weeds. This will not only threaten and damage native biodiversity and ecosystem processes, but will also result in the need for expensive and controversial weed eradication measures in areas that do not currently contain roads and logging activity. Thus the consequences of weakening the Roadless policy from its current version will be both environmentally and economically harmful to our public lands and the taxpayers who support their proper stewardship. (Individual, Davis, CA - #A5401.31300)

1556. Public Concern: The Forest Service should ensure that its policies support rather than hinder the campaign to minimize damage caused by invasive exotic plants.

Current efforts are not adequate to control these invaders [exotic and invasive plants]. The Forest Service spends approximately $5 million annually on invasive plant control, yet this funds control efforts on only 100,000 of the more than 6 million acres invaded by exotic plants. It is hardly surprising that noxious weeds continue to spread across our western public lands at a rate estimated at 4,600 acres per day—that is, they cover a new area the size of Delaware every year. Again, this figure is surely an underestimate because it doesn't include many of the species invading our forests and grasslands.

Clearly, the Forest Service must ensure that its policies support rather than hinder the important campaign to minimize damage caused by invasive exotic plants. Protecting roadless areas is one of the

most important "weed control" policies because of the intimate connection between roads and the spread of invasive plants. Weeds' spread is greatly facilitated by human activities that disturb the soil, open the canopy, and injure vulnerable native vegetation. Road building directly disturbs vegetation, creates disturbed soils in which invasive plants often have advantage, changes water courses and opens the canopy to light. Weed propagules are often transported on the construction equipment or in fill or gravel.

The impact of roads is not short-term, but permanent. Roads open the area to heavier human use of all types—and those activities themselves contribute both further disturbance of soils and vegetation and modes for transporting weed seeds to these welcoming sites. Weed propagules can be carried on any truck, car, all terrain vehicle (ATV), logging equipment, boat, and livestock. Hikers, mountain bikers, and horseback riders also transport seeds. The increased presence of people also increases the likelihood of unplanned fires—which, again, can open opportunities for plant invasions.

Finally, weeds are spread from centers of infection by wildlife, wind, and water. These centers are often established by deliberate planting of the invasive species, including unwise choices for revegetation of disturbed, overgrazed, or burned areas. The link between roads and invasions is less clear for most exotic insects and fungal pathogens. In some cases, however, roadbuilding is directly linked to damaging infestations; the most prominent example is Port-Orford-cedar root disease, caused by Phytophthora lateralis. (Organization, Missoula, MT - #A17234.31320)

1557. Public Concern: The Forest Service should implement standards for insect and disease control.

AS PART OF THE FOREST PLANNING PROCESS

Standards for insect and disease control should be a part of forest planning so that an outbreak is controlled and potential usable losses are utilized before they become unsuitable. (Business, Eureka, MT - #A17220.31220)

1558. Public Concern: The Forest Service should consider that roadless area and transportation regulations and policies interfere with local grazing associations' work in controlling noxious weeds.

WHICH ARE A PERSISTENT PROBLEM ON THE NATIONAL GRASSLANDS

The roadless and transportation regulations and policies also interfere with local grazing associations' work in controlling noxious weeds, which are a persistent problem on the National Grasslands. The transportation and OHV policies will directly prohibit cross-country access for this work, again more evidence that the Forest Service has failed to assess the cumulative impacts on other programs. (Organization, Denver, CO - #A21358.31300)

1559. Public Concern: The Forest Service should not require horses to be diapered.

BECAUSE DEER AND ELK ALSO SPREAD SEEDS IN THE FOREST

Diapering horses is a really stupid idea as they do no more spreading seeds than deer or elk that eat hay out of the farmer's field and transport seeds back to the forest. Generally the seeds in the farmer's field are far less troublesome than the ones already on the forest. (Individual, Oak City, UT - #A40530.31313)

Adequacy of Analysis

1560. Public Concern: The Forest Service should evaluate the role of insects and disease in a forest ecosystem.

How should inventoried roadless areas be managed to provide for healthy forests, including protection from severe wildfires and the buildup of hazardous fuels as well as to provide for the detection and prevention of insect and disease outbreaks?

The role of insects and diseases in a forest ecosystem should [be] included [as] an assessment conducted in the early stages of plan revision or included as part of the Analysis of Management Situation of a revised plan. (Civic Group, Roanoke, VA - #A1713.31210)

1561. Public Concern: The Forest Service should examine insect and disease outbreaks.

BY ENLISTING THE AID OF HIKERS/VOLUNTEERS TO MONITOR AND REPORT OUTBREAKS

As part of a philosophy to encourage Americans to exercise and see their magnificent country, could we not support a modicum of trail building and enlist the aid of hikers/volunteers to monitor and report insect/disease outbreaks? (Individual, Craig, AK - #A778.31220)

It is my belief that the management of the "12 Mile Canyon" habitat has been an example of great management of federal lands. The roadless areas here are grazed by the deer, elk, and cattle of the local herds. Build up of hazardous fuel levels is rare due to this grazing.

The use of horse back rangers, herders, and local people well educated to the needs of the forest could detect early infestations and bring the need for management changes to the local board's attention. Under these conditions the need for controlled burns would be minimized and the proper utilization of the land to maintain herds of wild animals, and summer feed for the local cattle optimized.

In the past unilateral decisions made by government employees to limit the grazing of local cattle whose owners have purchased very expensive permits for that grazing, and then been denied the use of those permits, has been a very bad area of contention and frustration among local citizens. This is especially true when the deer and Elk herds are allowed to multiply to the point of overrunning the ability of the hunters and the predators to keep the herds in balance. (Individual, Gunnison, UT - #A25755.30560)

The detection and prevention of insect and disease outbreaks can be discovered by scouting parties. Me along with many of my fellow colleagues would love to work as a scout for the summer. This would be a great way for college kids to get experience in the field as ecologists or biologists.

Once an infestation is found the use of controlled burns or pesticides could be applied. Controlled burns could be used by scouts and pesticides could be applied by plane or helicopter. Both possibilities do not need roads to be carried out. (Individual, No Address - #A17702.31200)

BY EXAMINING OUTBREAKS ON FOOT, HORSEBACK, OR WITH THE USE OF AIRCRAFT

Walking is an essential part of a Forest Service ranger's duties. Examination of deadwood and underbrush accumulation, and detection of "insect and disease outbreaks" can be done on foot. Controlled burning, where deemed necessary, could be given approval under emergency protocols and accomplished by pedestrian personnel. Infestations could be controlled by crop dusting airplanes, and all activities outside areas under Wilderness designation could be supported by helicopter. (Individual, No Address - #A117.30600)

Disease detection and prevention might also be undertaken on foot or horseback and with the use of airplanes and helicopters. (Individual, Klamath Falls, OR - #A5118.30100)

In the case of detecting insect and disease outbreaks, I suggest the forest service continue its current preferred practice of aerial observation. (Individual, Clayton, GA - #A15320.30100)

Dead and diseased timber must be removed to prevent the buildup of potentially deadly fuel. The best way to discover insect-infested and diseased timber is to send Forest Service rangers into the field to look for insect-infested and diseased timber. This use of personnel can also help with enforcement issues and increase visitor contacts. (Individual, Fort Collins, CO - #A20609.30550)

BY ESTABLISHING AN ENTOMOLOGICAL COLLECTION STATION AT THE BORDERS OF NATIONAL FOREST SYSTEM LANDS

Entomological collection stations should be established at the borders of FS lands to detect in-flux of harmful insect vectors, or other forest disease transmission vehicles. Reduction of "natural event" fires should be limited to certain wilderness areas which directly impact populated areas and should be restricted to techniques which do not require construction of roads. Impact analysis of development of such areas should be included in all environmental assessments for new projects. Natural "burns" are part of the natural cycles of events. If forests are allowed to fully develop and mature, natural fires will be largely limited to the forest understory and will be self limiting. (Individual, Stone Mountain, GA - #A19230.30100)

WITH REGULAR SURVEYS

Of course regular surveys to detect insect and disease are a must. But I think this is being done now. The problem is that there has not been prompt action when outbreaks occur. This is generally due to obstructionists' actions and lawsuits. (Individual, Portland, OR - #A28106.30100)

AND THEN ACT ACCORDINGLY

Regarding insects and disease outbreaks, carefully study the cause and then act appropriately such as removing climax tree species, planting/encouraging seral tree species and perhaps planting resistant tree species. (Individual, Coeur d'Alene, ID - #A4798.31220)

1562. Public Concern: The Forest Service should fairly evaluate all sources that contribute to the noxious plant problem.

INCLUDING HIKERS, MOUNTAIN BIKERS, EQUESTRIANS, WILDLIFE, AND NATURAL PROCESSES

Motorized recreation is not the only contributor to the noxious weed problem. In fact, the mechanisms for transport of noxious weeds is greater for other visitors including hikers, equestrians, and visitors with llamas than it is for motorized recreationists. These transport mechanisms include hair, fur, manure, shoes, and fabrics. The smooth metal and plastic surfaces on motorized machinery do not have a surface texture that will pick up and hold noxious weed seeds. Additionally, motorized recreationists practice the "Wash your Steeds" policy. However, restrictions for concerns associated with noxious weeds are only placed on motorized recreationists.

The document must make a fair evaluation of all sources that contribute to the noxious weed problem including hikers, mountain bikers, and equestrians. The document must also fairly evaluate how natural processes and wildlife spread noxious weeds. The environmental document must include a balanced discussion of the noxious weed problem. The discussions, decisions and measures used to mitigate noxious weeds should be applied impartially to all visitors. (Organization, Helena, MT - #A13226.31313)

Weeds are spread from centers of infection by wildlife, wind, and water. These centers are often established by deliberate planting of the invasive species, including unwise choices for revegetation of disturbed, overgrazed, or burned areas. The link between roads and invasions is less clear for most exotic insects and fungal pathogens. In some cases, however, road building is directly linked to damaging infestations; the most prominent example is Port-Orford-cedar root disease, caused by *Phytophthora lateralis*. (Organization, Portland, OR - #A12004.30100)

INCLUDING ROADS

Roads are also the vector for noxious weeds to invade wildlands. Roads act in two ways to encourage the spread of invasive species. One way is simply easy movement of seeds into intact systems via cars and people. The road itself is a disturbance to the system which facilitates the germination of several weed species. Finally, since roads are impenetrable to water, it tends to run off to the side of the road creating a gradient of water availability from the road. Invasive species which normally would not survive in various conditions are able to thrive along roadsides due to the increase in water. These invasive species may also contribute to the fuel load, increasing the threat of wildfires in roaded areas. (Individual, San Francisco, CA - #A7044.31310)

1563. Public Concern: The Forest Service should reevaluate insect and disease risk.

AND INCORPORATE SPECIFIC DIRECTION FOR INSECT AND DISEASE RESPONSE WITHIN THE UNROADED AND ROADLESS AREAS

As with the increased risk of fire, the DEIS (3-12) acknowledges that insect infestation and disease will continue to be a problem on the roadless and unroaded areas. While the DEIS indicates this risk is particularly high on 7 Million acres of inventoried roadless areas, based on our knowledge of the local roadless and unroaded areas it is our opinion that this value is significantly understated. We suggest that this issue be reevaluated and specific direction be incorporated as to insect and disease response within the unroaded and roadless areas. (County Attorney, Grant County, OR - #A17667.30100)

1564. Public Concern: The Forest Service should expand its studies of ecosystem interactions.

BECAUSE FEW AREAS ARE IN DANGER FROM INSECTS AND DISEASE

In addition, few roadless areas are under serious danger from insects and disease. Many insects and disease are a natural part of the forest ecosystem. The forest service should continue and expand its studies of ecosystem interactions. (Individual, Greensboro, FL - #A18256.30100)

Funding

1565. Public Concern: The Forest Service should direct its funding to the management of disease, insects, and noxious plants.

Management of roadless areas should be done in concert with the natural order—natural wildfires, for instance, burn off much of the "hazardous fuels" (i.e., forest detritus), and should be monitored, but otherwise left alone. Most of the department's funding should go towards the management of diseases, which are often not so "natural" in regards to their origins in relation to the forest. Also, climate changes are shifting advantages to various blights not seen before, as well as influencing insect populations. These must be controlled. (Individual, Anchorage, AK - #A518.30100)

Current efforts are not adequate to control these invaders. The Forest Service spends approximately $5 million annually on invasive plant control, yet this funds control efforts on only 100,000 of the more than 6 million acres invaded by exotic plants. It is hardly surprising that noxious weeds continue to spread across our western public lands at a rate estimated at 4,600 acres per day -- that is, they cover a new area the size of Delaware every year. Again, this figure is surely an underestimate because it doesn't include many of the species invading our forests and grasslands. (Organization, Portland, OR - #A12004.31320)

INSECTS AND DISEASES OF LIVESTOCK AND MAMMALS

Also, additional funding is needed to allow for the study of infestations by insects and diseases of livestock and other mammals. (Individual, Colorado Springs, CO - #A22203.30100)

1566. Public Concern: The Forest Service should increase funding for research and development of biological means of preventing and controlling insect and disease.

Funding should increase for research and development of biological means of preventing and controlling insect and disease. (Individual, Gallatin Gateway, MT - #A19100.31220)

1567. Public Concern: The Forest Service should reallocate money earmarked for timber removal to hiring a staff large enough, and capable enough, of recognizing forest health problems early on.

Insects and disease outbreaks can be detrimental to forests and their ecosystems. However, if they are caught early enough they can be treated on a smaller level. The threat is easily neutralized this way.

This is why local officials should reallocate resources currently earmarked for logging, and roadbuilding. This currently amounts to over 200 million dollars annually. The funds should be reallocated toward hiring a staff large enough, and capable enough of recognizing these problems early on.

Roads are not needed to combat these problems, they can be treated chemically, if necessary, from the air. They are also best identified by hiking through the woods, and not from the steel cage, and air-conditioned comforts of an automobile. (Individual, Walla Walla, WA - #A17698.31220)

1568. Public Concern: The Forest Service should acknowledge the financial contribution made by off-road vehicle users to noxious plant abatement programs.

In Montana, OHV owners as part of their vehicle registration contribute $1.50 to a noxious weed abatement program. Non-motorized visitors do not contribute to any weed abatement program. The environmental document does not have a balanced discussion of the noxious weed problem. The discussions, decisions and measures used to mitigate noxious weeds should recognize the minor impact that OHVs have on the noxious weed problem and also credit OHV visitors for contributing to a program to control noxious weeds. (Organization, Helena, MT - #A13226.31320)

Active Management

1569. Public Concern: The Forest Service should control insects, disease, and noxious plants.

TO REDUCE FIRE HAZARDS

Large stands of trees all over the Black Hills are being killed by the beetles. Before we have another major fire this needs to be controlled. (Individual, Custer, SD - #A4729.30100)

TO SAVE GAME RANGE

The other major oversight the Kootenai and all of region 9 has been guilty of is the ignoring of knapweed for so many years. There is absolutely no justification for having hundreds of thousands of acres of game range destroyed by this and other pests. (Individual, Libby, MT - #A8286.31300)

BY PRESCRIBING AND IMPLEMENTING TREATMENTS THROUGH THE FOREST PLANNING PROCESS

Disease and Insect Infestation: The preferred alternative for stewardship of roadless areas. Specific treatments would be prescribed and implemented through local forest planning. (Individual, Klamath Falls, OR - #A4970.31220)

BY REINTRODUCING FIRE TO ROADLESS AREAS

I believe the Forest Service has made significant progress in allowing fire to return to "inventoried" roadless areas and other unroaded areas such as designated wilderness areas. The fire plan for the existing Selway Bitterroot Wilderness area is an excellent example of such a plan. I see no reason why similar approaches cannot be taken for the inventoried roadless areas. The final rule allows for prescribed burning and even some logging to protect ecological integrity.

As far as insect and disease outbreaks go, I think that reintroducing fire into roadless areas will help to reduce the potential threat of insect and disease outbreaks. As I am sure you are aware, insects and disease are important factors in maintaining ecological health of the system. Many wildlife species, for example, are dependent on insect and disease outbreaks for their very survival. A healthy forest is not necessarily insect and disease free. As you will recall the findings of the Interior Columbia River Basin

study suggest that inventoried roadless areas contain some of the most ecologically intact areas in the entire basin. I am sure this is true in other roadless areas across the country.

Passing the roadless rule is not going to change the natural processes that have been ongoing in these areas for thousands of years. The existing roadless areas are the areas where we have the best chance of maintaining the beneficial effects of natural ecological processes such as fire, disease and insects. Yes, we can never return completely to historical conditions due to significant alterations that we humans have already made across the landscape. However, within the roadless areas we have our best chance to come close and maintaining these processes without threatening human development. (Individual, Moscow, ID - #A4871.30100)

BY IMPLEMENTING REASONABLE FIRE POLICIES IN ROADLESS AREAS

In the 1980s the Forest Service spent millions of dollars in studies of the Douglas-fir tussock moth and the spruce budworm. Research showed that the predominant characteristic of stands with outbreaks was that the trees were on poor site classes and would probably not have been significant stand components if fire regimes had been maintained. Thus, disease was a function of fire management policies and poor silvicultural decisions. If reasonable fire policies were implemented on roadless areas, disease outbreaks would probably be reduced dramatically. (Individual, Bozeman, MT - #A17508.30400)

BY PROHIBITING SINGLE-SPECIES REPLANTING

Stop single-species replanting if you really want to reduce insect/disease outbreaks. (Individual, No Address - #A29646.30100)

Managing for prevention of insect outbreaks can be handled by planting a greater diversity of trees. (Elected Official, Bozeman, MT - #A27736.30200)

Pristine areas like the “Roadless Areas” are resilient, and they can and have withstood these insect invasions, for thousands of years, long before humans arrived on the continent. Insects usually attack trees that are stressed by climate changes (e.g. droughts) that are perfectly normal. There are two unusual insect infestations: those caused by exotic, introduced species for which there are no natural enemies, and in monocultures such as tree plantations where only one species is planted. Insect outbreaks affect a single species. Monoculture can lead to the loss of an entire forest. Needless to add that “Roadless Areas” are complex ecosystems comprising of varying age class (not a sterile monocultural well logged even aged tree farm), that can naturally withstand insect infestations. It is habitat fragmentation that jeopardizes forest health. The primary reason for that would be roads, followed by logging or other forms of material extraction. Thus a weakened ecosystem would be susceptible to insect and disease invasions. (Individual, Seattle, WA - #A26287.30100)

WITH PROPER FOREST MANAGEMENT AND PROTECTION PRACTICES TO PREVENT THE SPREAD TO ADJOINING PRIVATE LANDS

We recommend that considerations be given to adjoining landowners when insect or disease infestations occur on National Forest lands. The Forest should be allowed to apply the proper forest management and protection practices to control these infestations and prevent their spread to adjoining private lands. (Association, Jackson, MS - #A4824.31220)

The Department is of the opinion that the Forest Service must preserve management options in roadless areas. Neither fire, insects or disease stop at property boundaries. The Forest service should not employ national roadless policy that limits forest land managers from making timely decisions on these issues. Protection efforts must focus on the specific needs of each roadless area. A minimal network of unimproved, unclassified roads to provide access for protection purposes may be needed in some roadless areas while not in others. As stewards of public land we have an obligation to prevent the spread of insects, disease and fire onto private property. Living next to a National Forest should not be a potential liability. (State Agency, Madison, WI - #A28775.30100)

There are options that place more focus on how the areas surrounding unroaded areas are managed. For example, if fuel buildup, dangerous wildfire conditions or insect/disease outbreaks are a problem within an unroaded area, efforts could be intensified on adjacent land ownerships to lower their risks (e.g., fuel reduction, structure protection measures, management increase resistance to insects/diseases of concern). Evacuation and communication systems and plans in adjacent areas may also be appropriate if fuel buildup within roadless areas is a problem. (State Agency, Saint Paul, MN - #A30025.30100)

It is a joint responsibility of the Forest Service and communities and landowners to keep trees and brush in a narrow strip, on both sides of the roadless areas boundary, thinned to the point where fires can be controlled. (Individual, San Simon, AZ - #A30339.30400)

Management plans and activities of the national forests should include recognition of risks, such as wild fire, insects, and diseases, to adjacent private lands and communities, the input of national forest neighbors should be considered in the development of those plans. (Individual, Rocky Mount, NC - #A30042.30200)

WITH ADVICE FROM PROFESSIONALS

Insect pests and disease need to be treated, if at all, on the advice of qualified biologists, those not employed by paper or pulp industries. (Organization, Cookeville, TN #A5451.31220)

I am not a professional forester, so detection and prevention of insect and disease outbreaks is out of my scope. However, within parameters established by budgets and cost benefit analysis, perhaps scheduled field studies by silviculturists, entomologists, and/or aerial surveys would suffice. (Individual, Vista, CA - #A4838.30310)

The best way to manage roadless areas is as follows:

In consultation with disinterested (i.e. not working for industry or the Forest Service) biologists, work to eradicate damaging invasive species such as tamarisk and cheatgrass. (Individual, Dallas, TX - #A18002.30200)

WITH THE IMPLEMENTATION AND ENFORCEMENT OF U.S. DEPARTMENT OF AGRICULTURE RECOMMENDED INITIATIVES

Implement and enforce USDA recommended initiatives to prevent the spread of introduced diseases. ROADS and logging disturbance are one of the best ways to spread invasive species, another reason to keep roadless areas roadless. Disease outbreaks will have to run their course, experience shows that logging is not a solution. (Individual, Woods Hole, MA - #A12805.31210)

WITH MULTIPLE METHODS

Weed control/using multiple methods that are integrated should receive priority also. (Individual, No Address - #A101.31300)

You have requested comments on how roadless forest areas should be managed to protect them from severe wildfires or insect outbreaks. We submit that Nature has its own built-in protections if allowed to work and, thus, the Forest Service should try to replicate them as nearly as possible. For example, fire is a natural component of natural forests. In many instances, you can allow wildfires to burn themselves out, and that way the build-up of hazardous fuels is avoided. The same is true of most insect and disease outbreaks. We now, in the southeast, have outbreaks of the Southern Pine Beetle and have noted plots in the national forests that have been completely killed by them. However, those were artificial plots where the trees were planted within a yard of each other. They were, consequently, stressed when not thinned (and they were not) and so became obvious dessert for the beetles. The answer is to provide for natural revegetation and not artificial stands that are subject to insect outbreaks. [Footnote 2: There are certain infestations, however, that require attention because they are the result of impacts from outside sources. One is the Gypsy Moth, and a lot of research has gone into what types of protection are the best. It

appears that use of the virus known as Gypcheck and a fungicide (Entomophaga maimaiga) are preferable because they are target-specific to the Gypsy Moth. Other preferable treatments are biological controls such as mating disruptions and sterile insect releases. Use of broad-spectrum insecticides like Diflubenzuron are not desired because they affect many beneficial moths and butterflies, including even the Monarch butterfly. A similar problem is noted with Bacillus thuringensis since it is also not target-specific to the Gypsy Moth. Thus, some treatment may be necessary on natural areas because of invasions by this non-native insect pest.] (Organization, Birmingham, AL - #A21582.30100)

WITH CHEMICALS AND OTHER SOLUTIONS

Insect and disease breakouts should be fought with chemical or other solutions when they are caused by alien species or when they arise as an effect of environmental damage (e.g., we should fight insect species that become immune to natural defenses as a result of their exposure to genetically engineered organisms). (Individual, Norwalk, CT - #A884.31220)

A problem: Our pine trees are being slaughtered by beetles. In some areas around Dale Hollow Lake (East of Celina) are dying in large patches and other areas . . . . Is there some way to spray to stop these beetles? (Individual, Celina, TN - #A11902.31210)

WITH AERIAL APPLICATIONS

Insect and disease control can be accomplished by spraying from airplanes not sitting at desks. (Individual, Ogden, UT - #A280.31220)

During the 1950s when the FS hired temporary employees in the summer to go into the forest to spray for pine beetles and insects and they walked into the forests. Horses can also be used. Couldn't this be done again? Why do we need roads every where? (Individual, Ogden, UT - #A1166.31221)

IN ROADED AREAS IDENTIFIED AS SUITABLE FOR LOGGING

Concerning insect and disease outbreaks, the Forest Service might consider a strategy that focuses its workforce on detecting and preventing outbreaks in roaded areas that are identified as suitable for timber production. Focusing on these areas rather than spreading limited resources over both roaded and unroaded areas would be a better use of limited resources. We believe that concentrating resources in these areas and gaining the economies of scale would provide better protection in roaded areas. (Federal Agency, Washington, DC - #A28843.31200)

OUTSIDE OF ROADLESS AREAS

The roadless areas should be left alone as much as possible, to provide a natural environment for the benefit of wildlife and protection of water, soil and air resources. Insect and disease outbreaks should be fought OUTSIDE of the roadless areas. (Individual, No Address - #A30493.30100)

EXCEPT IN LARGE-SCALE TRACTS OF LAND

Forests need to be big enough to sustain the heavy loss of big beetle kills, so that subsequent big fires can kill beetle larvae, or the root rot, and burn in a mosaic that encourages self seeding. It is simply not possible to recreate such natural forces through harvest. Period. Certainly in areas of human habitation, beetle kill and root rot, etc. needs to be contained, but not in large-scale tracts. These dynamic pestulances have occurred for millennia, and result in more genetically resilient ecosystems. We shouldn't have to protect forests from beetle infestations and fires—forests have been taking care of themselves just fine, until we reduce their size to unhealthy proportions. (Individual, No Address - #A30491.30100)

AT THE LOCAL LEVEL

The second example in NW Montana involves the Douglas Fir beetle, which is becoming epidemic in selected locations. How do our Forest Managers confront this challenge when some parcels are considered off limits? Is it acceptable to not have a forest protection plan for the whole forest? Can we allow an epidemic to start in a roadless area, only to spread to adjacent lands (both public and private)?

Again, the place to address these issues is at the Forest and District level, not by National Rule making. (Permit Holder, Whitefish, MT - #A20669.31200)

1570. Public Concern: The Forest Service should allow even age management only in areas experiencing an onslaught of pests.

A practical solution is a timber harvest program such as the one used by the Mescalero Apache Tribe. This is a European type of sustained yield silvaculture. Clear cuts are seldom employed except in areas where almost all the trees are experiencing an onslaught of pests. (Individual, Ruidoso, NM - #A17775.65230)

Ecosystem/Restoration Management

1571. Public Concern: The Forest Service should acknowledge that native insects and diseases are part of a healthy ecosystem.

BECAUSE THEY ARE VITAL TO ECOLOGICAL SUSTAINABILITY AND BIODIVERSITY

Besides wilderness lands, roadless areas represent the most ecologically intact and healthy forests managed by the agency. They do not require protection from insects are an integral part of what makes them functions and serve as habitat for a biologically diverse array . . . of native species. There is simply no ecological or scientific need for hands on insects or disease management in roadless areas. The agency obsession with protecting individual trees or stands of trees is antithetical to ecosystem sustainability and detrimental to the conservation of biodiversity on public lands. (Organization, Missoula, MT - #A17234.31210)

Insect infestation and disease should be left untreated. (Individual, Bozeman, MT - #A6250.31220)

The answer to this question is known to all professional biologists like myself; the best management is **no** management. Insect and disease outbreaks are natural and necessary occurrences that contribute to the diversity of forest habitats and form the basis for many important forest cycles. The fact that they interfere with timber production is not a forest health issue, it is a corporate profits issue. Healthy, functioning forests require fire, insect and disease outbreaks, and blowdowns to function as ecosystems, and the public interest lies in protecting these ecosystems, not maximizing the profits of a few private, special-interest groups. (Individual, Laramie, WY - #A10590.30100)

The SPB is not a pest on Federal Land but a beneficial insect needed to provide food and habitat for other wildlife. The SPB is only a pest to timber growers which should not be the primary purpose of our public lands as it has in the past. (Individual, Augusta, GA - #A4688.31210)

BY EXPLAINING THE ROLE INSECTS PLAY IN FOREST NUTRIENT CYCLING AND RENEWAL

The rule should address the essential role that insects play in forest nutrient cycling and renewal. Emphasizing individual tree health subverts the goal of ecosystem management integrity and long-term sustainability of forests and their myriad biotic components of a healthy forest. Decaying and dead trees are essential components of a healthy forest. (McClelland and McClelland 1999). Further:

Pathogens help decompose and release elements sequestered within trees, facilitate succession, and maintain genetic, species and age diversity. Intensive control measures, such as thinning, salvage, selective logging, and buffer clearcuts around affected trees remove crucial structural features. Such activities also remove commercially valuable, disease-resistant trees, thereby contributing to reduced genetic vigor of populations (Castello et al. 1995). (Organization, Missoula, MT - #A613.31210)

BY NOT ASSUMING ROADLESS AREAS ARE IN AN UNHEALTHY STATE

[Question 3] This is an embarrassing question because it presupposes roadless areas are in an unhealthy state and that only Forest Service managers via its entourage of loggers, cattle and sheep men can bring these sick and ailing roadless areas back to health. That whole concept verges on ecological illiteracy

and it is troubling to see the "new" Forest Service head back in that direction. It is preposterous to suggest roadless areas as a class of landscapes suffer from such ailments—maybe some do, not all!

More to the point, the question isn't how we intervene in roadless areas, but the importance of not intervening in roadless areas to assure old and dying trees are part of the system and to assure fires burn the way integral forests "intended" fires to burn—the same with pathogens. These are as normal as the sun and moon and the sky.

Given that, where intervention is necessary, and we believe it is in some cases, but not uniformly and across the board as this question suggests, the NRAC rule defined exception after exception, most built on sound ecological principles and underpinned by meaningful policy and policy making. (Organization, Hyrum, UT - #A13496.30100)

1572. Public Concern: The Forest Service should control insects, disease, and noxious plants.

WITH NATURAL REMEDIES

Insect and disease outbreaks should be controlled as much as possible with natural remedies, and any non-natural solutions should be weighed against long-term effects. For example, we shouldn't wipe out a noxious weed at the expense of other plants and animals in the area. (Individual, Shawnee Mission, KS - #A96.50300)

WITH SPECIES DIVERSITY AND MULTI-AGE STANDS

Species diversity and multi-age stands of trees are two ways that the impacts of disease and insect infestations can be decreased. Epidemic size outbreaks might be better treated with some of the savings form decreased fire control. (Individual, No Address - #A405.31220)

BY PROHIBITING ROAD CONSTRUCTION IN ROADLESS AREAS

Protecting roadless areas is one of the most effective strategies for curtailing invasions by exotic or alien species of plants—also called invasive weeds. The Forest Service estimates that 6 million acres are already infested. (The invasion is actually probably much more extensive, since these data do not include cheatgrass or many of the shrubs and vines invading eastern forests.).

While little data are available on weed infestations in National Forests in the east, they are clearly extensive. Forest Service monitoring data show that just one of the probably 100 exotic plant species invasive in these forests, Japanese honeysuckle (Lonicera japonica), is found on 16 million acres of public and private forest in just six states of the southeast. Privet (Ligustrum spp.) occupies 2.4 million acres of these forests. Purple loosestrife is a pervasive problem in ditches and wetlands of the northwoods.

These weeds have severe ecological impacts. Clearly, the Forest Service must ensure that its policies support rather than hinder the important campaign to minimize damage caused by invasive exotic plants. Protecting roadless areas is one of the most important "weed control" policies because of the intimate connection between roads and the spread of invasive plants. Weeds' spread is greatly facilitated by human activities that disturb the soil, open the canopy, and injure vulnerable native vegetation. Road building directly disturbs vegetation, creates disturbed soils in which invasive plants often have advantage, changes water courses and opens the canopy to light. Weed propagules are often transported on the construction equipment or in fill or gravel.

The impact of roads is not short-term, but permanent. Roads open the area to heavier human use of all types—and those activities themselves contribute both further disturbance of soils and vegetation and modes for transporting weed seeds to these welcoming sites. Weed propagules can be carried on any truck, car, all terrain vehicle (ATV), logging equipment, boat, and livestock. Hikers, mountain bikers, and horseback riders also transport seeds. The increased presence of people also increases the likelihood of unplanned fires—which, again, can open opportunities for plant invasions. (Organization, Plymouth, MN - #A7116.30100)

BY ENCOURAGING A PROLIFERATION OF SONGBIRDS AND OTHER NATURAL PREDATORS THAT FEED ON INSECTS

While there may be limited justification for harvesting trees in order to serve stewardship purposes, the first line of defense in forest health should be the use of natural elements. A forest that has a mosaic of composition and structure is less likely to have severe disturbances than one that is or resembles a plantation. Also, a proliferation of songbirds, and other species that feed on insects, needs to be encouraged. Removing dead trees from a forest removes the habitat essential for cavity nesters that feed on insects (e.g., woodpeckers). (Organization, Anchorage, AK - #A17358.30100)

How should inventoried roadless areas be managed to provide for healthy forests, including protection form severe wildfires and the buildup of hazardous fuels as well as to provide for the detection and prevention of insect and disease outbreaks? . . . Natural predators for insects. (Individual, Ellijay, GA - #A8020.30100)

BY CLOSING ROADS

A root rot fungus is wiping out the rare and valuable Port Orford cedars in this area; the die-off is most intensive along roads, where vehicles carry the fungus spores from infected areas to healthy ones. Local Forest Service officials need to close many of these roads, but local pressure from motorcycle and other vehicle groups is apparently more than they can stand up to; wet-season restrictions are posted, but the roads are still there and the trees are still dying at a shocking rate. (Individual, Medford, OR - #A12075.90310)

1573. Public Concern: The Forest Service should allow wildfires to destroy insects and disease.

RATHER THAN USING TIMBER REMOVAL TO DESTROY THEM

The best (and least expensive) way to kill destructive insects and diseases is to allow wildfires to destroy them. Logging slash, in fact, serves as nurseries for diseases and insects such as bark beetles. (Individual, Fairbanks, AK - #A13293.31320)

1574. Public Concern: The Forest Service should not use pesticides and herbicides.

Pesticides and herbicides should never be used as they pollute the environment and poison both humans and wildlife. (Individual, Marion, NC - #A4691.31220)

Pesticide use should be banned in inventoried and non-inventoried roadless areas. (Individual, New Haven, CT - #A8987.31220)

As far as pest prevention is concerned - spraying a forest with herbicides may be more detrimental to the forest ecosystem as a whole versus letting nature take its course. (Association, No Address - #A17699.31321)

1575. Public Concern: The Forest Service should control only exotic or non-native insects and diseases.

Regarding the management of inventoried roadless areas to provide for the detection and prevention of insect and disease outbreaks, the Forest Service should make clear that insects and diseases are part of a healthy forest. We note the exception of exotic or non-native species such as the gypsy moth and believe that provisions can be made for the well-justified control of these invaders. There are also periodic epidemics of native insects and diseases that may warrant control measures. (Civic Group, Roanoke, VA - #A1713.31210)

Disease and insect outbreaks of natural origin should be allowed to run their course. More active management may be needed if the pathogens or insects are exotic species brought in by man. (Individual, Painted Post, NY - #A357.31220)

Forest Service managers should let nature take its course concerning native disease and past outbreaks.

Forest Service managers should make every effort to prevent and/or counter any non-native disease or pest outbreak. Such efforts should include determination and introduction or enhancement of naturally occurring resources, including safe and controllable non-native resources, to counter non-native disease and pestilence. (Individual, Saint Louis, MO - #A629.31220)

We submit that Nature has its own built-in protections if allowed to work and, thus, the Forest Service should try to replicate them as nearly as possible. For example, fire is a natural component of natural forests. In many instances, you can allow wildfires to burn themselves out, and that way the build-up of hazardous fuels is avoided. The same is true of most insect and disease outbreaks. We now, in the southeast, have outbreaks of the Southern Pine Beetle and have noted plots in the national forests that have been completely killed by them. However, those were artificial plots where the trees were planted within a yard of each other. They were, consequently, stressed when not thinned (and they were not) and so became obvious dessert for the beetles. The answer is to provide for natural revegation and not artificial stands that are subject to insect outbreaks. [Footnote 2: There are certain infestations, however, that require attention because they are the result of impacts from outside sources. One is the Gypsy Moth, and a lot of research has gone into what types of protection are the best. It appears that use of the virus known as Gypcheck and a fungicide (ntomophaga maimaiga) are preferable because they are target-specific to the Gypsy Moth. Other preferable treatments are biological controls such as mating disruptions and sterile insect releases. Use of broad-spectrum insecticides like Diflubenzuron are not desired because they affect many beneficial moths and butterflies, including even the Monarch Butterfly. A similar problem is noted with Bacillus thuringensis since it is also not target-specific to the Gypsy Moth. Thus, some treatment may be necessary on natural areas because of invasions by this non-native insect pest.] (Organization, Birmingham, AL - #A21582.30100)

1576. Public Concern: The Forest Service should protect roadless areas.

TO CURTAIL INVASIONS BY EXOTIC OR ALIEN SPECIES OF PLANTS

Protecting roadless areas is one of the most effective strategies for curtailing invasions by exotic or alien species of plants—also called invasive weeds. The Forest Service estimates that 6 million acres are already infested. (The invasion is actually probably much more extensive, since these data do not include cheatgrass or many of the shrubs and vines invading eastern forests.) The grasslands and meadows of the northern Interior West suffer some of the most damaging exotic plant invasions of anywhere on Earth. About one-third of the Intermountain Region is infested by cheatgrass (Bromus tectorum). Yellow starthistle (Centaurea solstitialis) covers more than 12 million acres in ten states and two Canadian provinces. Spotted knapweed covers 7.2 million acres in nine states and two provinces, including 4.7 million acres in Montana (Beck 1993).

These weeds have severe ecological impacts. Cheatgrass is one of the weeds considered to be an "ecosystem changer." Wildfires fueled by cheat have virtually eliminated native sagebrush and rabbitbrush depended on by wildlife, including mule deer, antelope, raptors, songbirds, rabbits, and native lizards. Among the more than 1,000 exotic plant species in 5 states in the Pacific Northwest and northern Interior West, some are even less useful for wildlife than is cheatgrass. Knapweed invasions have severely damaged the value of foothill grasslands in western Montana's Missoula and Bitterroot Valleys for winter elk range, for example. While research on the impacts of the vines and shrubs in the eastern forests has so far been limited, it has shown that Japanese honeysuckle impedes regeneration of both managed and natural forests. Research in Ohio found that robins and wood thrushes raised fewer young in nests placed in certain exotic shrubs than in those located in native shrubs. Others have shown reduced numbers of soil invertebrates beneath exotic shrubs. (Organization, Nevada City, CA - #A4941.31310)

Current efforts are not adequate to control these invaders [exotic and invasive plants]. The Forest Service spends approximately $5 million annually on invasive plant control, yet this funds control efforts on only 100,000 of the more than 6 million acres invaded by exotic plants. It is hardly surprising that noxious weeds continue to spread across our western public lands at a rate estimated at 4,600 acres per day—that is, they cover a new area the size of Delaware every year. Again, this figure is surely an underestimate because it doesn't include many of the species invading our forests and grasslands.

Clearly, the Forest Service must ensure that its policies support rather than hinder the important campaign to minimize damage caused by invasive exotic plants. Protecting roadless areas is one of the most important "weed control" policies because of the intimate connection between roads and the spread of invasive plants. Weeds' spread is greatly facilitated by human activities that disturb the soil, open the canopy, and injure vulnerable native vegetation. Road building directly disturbs vegetation, creates disturbed soils in which invasive plants often have advantage, changes water courses and open the canopy to light. Weed propagules are often transported on the construction equipment or in fill or gravel.

The impact of roads is not short-term, but permanent. Roads open the area to heavier human use of all types—and those activities themselves contribute both further disturbance of soils and vegetation and modes for transporting weed seeds to these welcoming sites. Weed propagules can be carried on any truck, car, all terrain vehicle (ATV), logging equipment, boat, and livestock. Hikers, mountain bikers, and horseback riders also transport seeds. The increased presence of people also increases the likelihood of unplanned fires—which, again, can open opportunities for plant invasions.

Finally, weeds are spread from centers of infection by wildlife, wind, and water. These centers are often established by deliberate planting of the invasive species, including unwise choices for revegetation of disturbed, overgrazed, or burned areas. The link between roads and invasions is less clear for most exotic insects and fungal pathogens. In some cases, however, roadbuilding is directly linked to damaging infestations; the most prominent example is Port-Orford-cedar root disease, caused by Phytophthora lateralis. (Organization, Nevada City, CA - #A4941.31320)

1577. Public Concern: The Forest Service should not use forest health as an excuse to harvest timber.

DO NOT CLAIM HARVESTING IS NEEDED TO PREVENT INSECTS AND DISEASE

Diseases and pests cannot all be prevented, nor should they be, and they are likely to be worse in areas that have been heavily cut, where new young trees are stressed by overcrowding and poorer soil because of erosion. For example, one argument for clearcutting is that it prevents the spread of dwarf mistletoe. Many mature forests have an occasional tree infested with mistletoe, but this does not kill them, and the majority of trees remain healthy. One forest service official admitted to me that the only reason that dwarf mistletoe needs to be controlled is to enhance timber production. So without timber harvest, forest health is not impaired by mistletoe. Even where trees do die of diseases and infestations, the dead trees have important functions in replenishing the soil and providing wildlife habitat. (Individual, Laramie, WY - #A30702.30000)

BECAUSE INSECTS AND DISEASE RARELY RISE TO EPIDEMIC LEVELS

The correct answer here, except in a very few rare and narrowly defined situations, is to let nature take its course. Contrary to popular opinion, nature does know best. I fear that alleged insect and disease outbreaks and fire hazard reduction will continue to be just the excuses the Forestry Circus, local economic interest, and their political toadies want and need to go in and continue to "manage" the forests.

A single bark beetle or tussock moth does not an epidemic make! Insect and disease levels rarely rise above endemic levels, contrary to the preachings of the timber industry, its wholly-owned politicians, and Forestry Circus pre-sale foresters, silviculturalists and others with vested interests in trying to make us believe otherwise. As for "the buildup of hazardous fuels", in the Intermountain and Great Basin West, and probably in much of the rest of the country, it's too cold and dry for logging and thinning slash to be left on the forest floor and expected to decompose. Slash and other logging/thinning debris will just lay there and contribute to an even bigger fire hazard unless it's chipped and scattered on site or

completely removed from the forest—neither of which, are very economically viable propositions. (Individual, Leadore, ID - #A20898.30100)

Protecting Communities (*Question 4)*

Question 4: Protecting Communities, Homes, and Property. How should communities and private property near inventoried roadless areas be protected from the risks associated with natural events, such as major wildfires that may occur on adjacent federal lands?

This section includes two subsections: Private Property Protection and Responsibility for Protecting Private Property.

Private Property Protection

Summary

General Comments – Several respondents question the need to focus attention on private property protection. One organization states that there is no need to revise the Roadless Area Conservation Rule with respect to private property protection because "few concentrated populations of either individuals or communities occur near inventoried roadless areas. Due to these population densities, a fire spreading from an inventoried roadless area would have little opportunity to endanger human life or property." Similarly, a group says that in some regions there is no need to protect communities from forest fires as they may be dominated by "fire resistant" ecosystems.

Other general comments include the recommendation that the Forest Service provide accurate maps depicting the location of "private lands within and adjacent to high-risk roadless areas," and the suggestion that the Forest Service formulate a limited management plan to address fuels reduction in stands of trees close to towns.

Adequacy of Analysis – Several respondents question the adequacy of analysis relative to private property protection. One association requests that the Forest Service "conduct a formal, localized risk assessment of the consequences of prohibiting active management within these areas." One individual suggests that "commercial logging is not necessary in our roadless areas to reduce fire risks," and "management of the surrounding public lands to reduce fire risks should only happen after a complete inventory is made of communities at risk."

Management – Respondents' comments regarding implementation of the Roadless Area Conservation Rule are reflected in their management suggestions for protecting private property. Some people assert that "private property should be protected in accordance with the existing roadless rule," as it already "allows for activities that would reduce the threat to lands . . . from catastrophic fire, insect or disease on nearby roadless areas." Others suggest further that the Forest Service use the basic "fire fighting policies it has in place now . . . but it should not include building roads into roadless areas." Similarly, some recommend not allowing commercial timber removal in roadless areas, maintaining that the Forest Service should not allow timber removal in the name of fire prevention for private property. Furthermore, another individual encourages the Forest Service to reconsider its policy to temporarily suspend

wilderness standards regarding wildfire suppression when communities adjacent to National Forest System lands are threatened.

Other respondents assert that local decisionmaking will lead to more effective protection of private property. One county elected official requests that "areas that are to be protected but not recommended as Wilderness should be allocated to a recognized land use category that allows for a locally specific complement of land management activities." An association concurs, and requests that the Forest Service "retract policies that interfere with local fire suppression and control." Several individuals state that the Forest Service should allow management activities in general which "reduce the risks of catastrophic wildfires and insect and disease infestation." Another person suggests there be a different management policy for whole functioning communities on or near National Forest System lands.

In the context of management related to private property protection, several respondents question the integrity of the Forest Service. One respondent asserts that the Forest Service is not being open about its policies: "We have had to expend considerable effort to attempt to pry information from Forest personnel about roads and other topics relating to our properties." One organization states that the Forest Service should "confine their interests to National Forests within their boundaries and not extend their power to private lands." Additionally, an association questions the Forest Service's intentions when it establishes a "roadless area" near private land holdings, and requests that "the appropriateness of such a designation" be carefully scrutinized.

A further management suggestion is that the Forest Service should balance private development with "the need for wide open spaces" and the need to protect "critical winter wildlife habitat." Finally, a few respondents ask the Forest Service not to "risk anyone's life to preserve property" and "not [to] take heroic measures to protect houses with wooden shingles.

Land Use Ordinances/Building Codes – The commenting public makes several suggestions to the Forest Service about how to discourage residential development near public land, how to revise building codes, and how to work with the homebuilding industry and with private property owners to reduce fire related damages to private property. A number of individuals who comment on the subject of development near public land state that "residential development" should be kept "away from public lands." One person recommends strongly discouraging new settlement "in areas that carry risk of natural disasters such as forest fires." This can be done by discouraging "developers from building in areas that are prone to recurring natural disasters," or by making "such developments less qualifiable for recovery insurance." Another suggestion for protecting private property from fire is to revise building codes to set construction standards that minimize likelihood of fire damage "not unlike that which has taken place in states where hurricanes and floods occur." One organization suggests that the Forest Service "work with the homebuilding industry to ban roofs that put people at high risk from fires." Finally, one individual suggests that the Forest Service secure conservation easements from private property owners located near roadless areas "which will put the interests of protection and preservation of natural forest values first."

Urban-Forest Interface – Many of the comments relating to the urban-forest interface state that the buffer zones and firebreaks should be created and maintained. The first step, according to one group, would be to identify urban-forest interface areas and develop appropriate prescriptions for the management of these areas. One individual suggests that roadless areas should be "a buffer between Wilderness and the urban interface."

Others request buffer zones or firebreaks between roadless areas and private property. For example, one individual states, "A buffer zone around such roadless areas should be established with incentives limiting the amount of future development in that area." Another respondent suggests working "with local communities, and property owners to provide 'fire breaks.'" The commenting public offers many suggestions for buffer zone requirements, such as a minimum width of 500 feet. Another individual suggests that "minimally urbanized areas should be maintained as buffer zones between roadless areas and human communities. Creation of carefully selected 'unmanaged zones'—areas where disease prevention, fire suppression, and insect control are not practiced—should be implemented in conjunction with accompanying buffer zones where more standard management practices exist, thus allowing the buffer areas to serve as transition zones from roadless areas to more urbanized regions." Finally, in cases where there may be "an unreasonable threat to private land," the land should be purchased by the government and then used "as a buffer zone." Some respondents assert that communities and private property owners should take the initiative for constructing their own buffer zones. One business owner suggests that "ski areas located adjacent to communities" may function as buffer zones against fire.

Some respondents question the advisability of creating buffer zones as a means of fire management. One individual asserts that buffer zones may not always be appropriate, stating that "this 'buffer zone' investment should only be employed where the adjacent private property values warrant." This individual further states that in the case of low-value land, a land exchange may be more appropriate. Another individual remarks that "roadless areas must not be fragmented by road building or firebreak building." Finally, one organization suggests that "wildland fuel reduction for reducing home losses may be inefficient and ineffective." Instead buffer zones may "be a high priority for extensive vegetation management due to high aesthetic, watershed, erosion, or other values, but not for reducing potential home loss."

Urban-Forest Interface Funding – One individual asserts that the Forest Service is improperly using funds earmarked for "fuels reduction projects in the urban-wildland interface zone. Instead of directing resources to protect communities, . . . the Forest Service is using emergency monies for large-scale commercial timber sales in the nation's most pristine forestlands, including roadless areas, [and] old growth forests."

Public Collaboration – The public offers many suggestions on how the Forest Service should work with local, state, and federal agencies to plan for and combat wildfire and other natural disasters near private property. Several respondents assert that the Forest Service should work "with local and federal agencies to plan for emergencies;" and in the event of a wildfire, "the Forest Service should cooperate with state and local agencies to bring the fire under control." Another individual states that "the decision on whether to initiate aggressive fire management in non-roadless areas should be a component of the local fire management plan." Several individuals encourage the Forest Service to develop an "educational plan that is given to every resident in these surrounding areas and work with these communities to get them involved with the care and protection of the forest and their own properties." One business suggests that education take place in the form of "fire protection and prevention seminars." Some individuals advise the Forest Service "to work with other federal agencies to implement better land use planning. Because local communities have failed so miserably at land use planning in this regard, federal guidelines are needed." Others suggest that public collaboration include keeping a log of

nearby property owners in order to "send them a list of emergency phone numbers," and that "private inholders should be seen as potential partners in forest and wildlife habitat stewardship."

Private Property Protection General

1578. Public Concern: The Forest Service should consider that there are few concentrated populations of either individuals or communities near inventoried roadless areas.

DUE TO THESE LOW POPULATION DENSITIES, A FIRE SPREADING FROM AN INVENTORIED ROADLESS AREA WOULD HAVE LITTLE OPPORTUNITY TO ENDANGER HUMAN LIFE OR PROPERTY

In Colorado, there are few roadless areas near the wildland/urban interface, where this issue becomes important. This is also true nationally:

few concentrated populations of either individuals or communities occur near inventoried roadless areas. Due to these population densities, a fire spreading from an inventoried roadless area would have little opportunity to endanger human life or property.

USDA Forest Service, 2000, p. 3-103.

Note also that of 112,722 fire starts on national Forest System lands from 1986-1996, only 16,611 of them began in roadless areas (USDA Forest Service, 2000, p. 3-104).

Note further that 43.5% of all national forest fire starts in this period were human-caused, but only 13.64% of human caused fires originated in roadless lands (ibid., calculations made from Tables 3-18 and 3-19, pp. 3-104, 105). This indicates that human-caused fires are far more likely to start outside roadless lands. Stated another way, roadless areas have fewer people and thus fewer fire starts. (Organization, Denver, CO - #A12008.30430)

1579. Public Concern: The Forest Service should consider that the Roadless Area Conservation Rule will have no impact on protecting communities from forest fires.

NEAR THE SAN JUAN NATIONAL FOREST

Large forest fires are rare in the San Juan National Forest. Most roadless areas on the San Juan are located at higher elevations and many are dominated by fire resistant spruce-fir ecosystems. The combination of deep winter snow pack, late snowmelt, and late summer monsoon storms makes for a wet forest ecosystem that is not very prone to large fires. Most large fires in our area have occurred on low elevation lands under private and tribal jurisdiction. The Roadless Rule will have no bearing on protecting communities from forest fires in our region. (Individual, Durango, CO - #A11655.30100)

1580. Public Concern: The Forest Service should provide accurate maps depicting the location of private lands within roadless areas.

The Forest Service must analyze potential impacts on communities and private property and must give these national forest neighbors meaningful opportunities to comment on decisions about roadless areas and the wildland/urban interface that might place them at increased risk. Therefore, it will be essential that the Forest Service produce accurate maps of the location of communities and private lands within and adjacent to high-risk roadless areas and the interface. We feel that the GIS database for the roadless areas did not have a complete inventory of private and state lands, so the public did not have an adequate opportunity to assess the proposed decisions. (Association, Augusta, ME - #A13312.35110)

1581. Public Concern: The Forest Service should formulate a very limited management plan to address fuels reduction in stands of trees close to towns.

There is a need to clear underbrush and the like from those stands close to towns and a limited (very limited) management plan to address those issues should be formulated. (Individual, Seattle, WA - #A26276.30310)

Adequacy of Analysis

1582. Public Concern: The Forest Service should conduct a formal risk assessment of the consequences of prohibiting active management within roadless areas.

The members of AFRC believe that the Forest Service must conduct a formal, localized risk assessment of the consequences of prohibiting active management within these areas. This was not done in the last assessment of the roadless areas. What are the risks of wildfires and insect and disease infestation, on these and adjoining lands if no active management is undertaken? Each roadless area is unique. Forest types, stand conditions, values at risk, management objectives and the context of the area in relation to the surrounding lands are among the factors that must be considered. This argues strongly for the use of the forestland management planning process. (Association, Portland, OR - #A19004.35210)

1583. Public Concern: The Forest Service should complete an inventory of communities at risk.

WITH THE COOPERATION OF OTHER FIREFIGHTING ORGANIZATIONS

Forest Service research has shown that the most effective fire protection plan for communities adjacent to both roadless and non-roadless areas is by managing the immediate vegetation within several hundred feet of structures. Management of the surrounding public lands to reduce fire risks should only happen after a complete inventory is made of communities at risk with the cooperation of other fire fighting organizations. Such management should focus on prescribed burns and proper removal of forest fuels. In the Forest Service's own National Fire Plan it was found that "the removal of large, merchantable trees from forests does not reduce fire risk, and may, in fact, increase such risk." In fact, U.S. Forest Service chief fire specialist Denny Truesdale has stated that the woody materials that need to be removed from our forests to prevent catastrophic fires are shrubs, twigs and saplings less than 3 inches in diameter—not mature trees. These Forest Service reports concur with the goals of the roadless rule as it stands. Commercial logging is not necessary in our roadless areas to reduce fire risks. (Individual, Bend, OR - #A27922.30200)

Management

1584. Public Concern: The Forest Service should protect private property in accordance with the Roadless Area Conservation Rule.

BECAUSE IT ALLOWS ACTIVITIES TO PROTECT ADJACENT LANDS

Communities and private property should be protected in accordance with the existing Roadless Rule. It allows for activities that would reduce the threat to lands owned by states, tribes, private companies, or individuals from catastrophic fire, insect or disease on nearby roadless areas. (Individual, Spruce Pine, NC - #A17504.20000)

1585. Public Concern: The Forest Service should continue to use the same basic fire-fighting policies it has in place now for protecting communities and homes.

WITH THE EXCEPTION OF ROAD BUILDING

The Forest Service can continue to use the same basic fire fighting policies it has in place now for protecting communities and homes but it should not include building roads into roadless areas to fight fires or to "salvage" timber in those areas. It is a well-known fact that fire is an essential part of the long-term health of a forest and nature must be allowed to take its course wherever possible. (Individual, Tenakee Springs, AK - #A5083.35210)

1586. Public Concern: The Forest Service should not allow timber removal in the name of fire prevention for private property.

People living immediately adjacent to roadless areas have made that choice to be near wilderness and thus should be responsible for their own plan for dealing with fires, etc., through such things as the creation of defensible space on their property. It is not the responsibility of federal agencies to have to create buffer zones between them and federal land. The argument for "thinning" of forests in roadless areas is nothing more than a ruse on the part of timbering interests to gain access to the timber for their own gain. (Individual, Missoula, MT - #A5325.35000)

Protecting Homes and Property: The construction of homes near forests should never be used as an excuse to approve more logging. The homes should be constructed in a defensible manner, and the owners should accept the risks just as people who choose to live in flood plains live with floods, people in California live with earthquakes, people on the Gulf Coast live with hurricanes, etc. (Individual, Reno, NV - #A5110.35230)

1587. Public Concern: The Forest Service should reconsider its policy to temporarily suspend wilderness standards regarding wildfire suppression.

WHEN COMMUNITIES ARE THREATENED

In the Eastern U.S., we have wilderness areas that adjoin private property and communities. Wilderness standards regarding wildfire suppression can be temporarily suspended by the regional forester when communities are threatened, however this can take valuable time and is certainly not the best situation if it can be avoided. The trade-offs between wilderness or backcountry management and efficient fire suppression must be carefully weighed through roadless area evaluations and face-to-face discussions with our communities of interest. Again, interests in Washington DC, whether they are the Wilderness Society, the Heritage Forest Campaign, the American Pulp and Paper Association, or the Forest Service Washington Office cannot, and should not answer this question. (Individual, No Address - #A5341.35000)

1588. Public Concern: The Forest Service should assign a land use category to protected areas which allows locally specific management activities.

TO PROTECT COMMUNITIES IN THE URBAN-FOREST INTERFACE ZONE

Management restrictions imposed on areas Congressionally-designated as wilderness present a tremendous challenge to rural communities located on the urban interface, where the threat of wildfire conflagrations is high and the ability to reduce or minimize those hazards is almost non-existent, given the prohibition to the use of mechanical treatment and other prescriptions not permitted in Wilderness areas. A perfect example of this is the Mokelumne Wilderness in Alpine County, where wilderness boundaries border residential and vacation homes in Shay Creek near Grover Hot Springs State Park in a boxed-in canyon. Insect infestation and tree mortality compounded by drought conditions in recent months makes this area highly susceptible to wildfire conflagration, threatening life, expanding these areas. Immediate attention should be given to reducing the threat of wildfire plan. Areas that are to be

protected but not recommended as Wilderness should be allocated to a recognized land use category that allows for a locally specific complement of land management activities. (Elected Official, Markleeville, CA - #A8597.25340)

1589. Public Concern: The Forest Service should retract policies that interfere with local fire suppression and control.

Unlike other states, North Dakota counties do not look to the Forest Service as the primary fire fighter, but the agency needs to retract policies that interfere with local fire suppression and control. (Organization, Denver, CO - #A21358.35120)

1590. Public Concern: The Forest Service should allow management activities on national forests.

TO ENSURE THE PROTECTION OF PRIVATE LANDS

Management of national forests, or lack of, should not pose additional risks to adjacent private lands or communities. Therefore, management activities should be accomplished that reduce risks of catastrophic wildfires and insect and disease infestation. The Forest Service must analyze potential impacts on communities and private property and must give these national forest neighbors meaningful opportunities to comment on decisions about federal lands that might place them at increased risk. (Individual, Longview, WA - #A6016.35000)

1591. Public Concern: The Forest Service should establish different wildfire management policies for areas where there are whole functioning communities on or near national forests.

In cases where whole functioning communities exist on or near National Forest land, wildfire management should be different. These local communities and the federal government (Forest Service) should collaborate to provide solutions for protection. This solution should be limited to actions that pose little to no ecological harm. (Individual, Akron, OH - #A17697.35220)

1592. Public Concern: The Forest Service should be forthcoming with information regarding management of private property and surrounding areas.

My family and I remain very concerned about how "Roadless" rules will affect our private properties, access to them, and potentially diminish their value. Also related to these serious concerns is our historical experience, in which we had difficulty in obtaining road information from the Forest Service. We feel that we have had to expend considerable effort to attempt to pry information from Forest personnel about roads and other topics relating to our properties and to the Inyo National Forest management of their immediate surroundings. We believe that our concerns and experiences may not be unique and may apply to other owners of inholdings within National Forests. (Individual, Lancaster, CA - #A18019.35000)

1593. Public Concern: The Forest Service should not seek to manage private lands.

We believe the government should manage our land fairly and confine their interests to National Forests within their boundaries and not extend their power to private lands. (Organization, Concord, CA - #A6998.12100)

1594. Public Concern: The Forest Service should scrutinize the appropriateness of roadless designations near private property.

Establishment of a "roadless area" near private land holdings should be severely scrutinized as to the appropriateness of such a designation under those site-specific conditions. (Association, Cody, WY - #A41559.40000)

1595. Public Concern: The Forest Service should balance private development with open space and critical wildlife habitat.

The need for wide open spaces has always been important. Allowing for private individuals to buy and build homes on property that is located on the forest and critical winter wildlife habitat grounds has exploded in recent years. There should be a way to accommodate both. We allow subdivisions to be built in the cities. Rules or laws should contain the amount of land that is improved upon in these critical areas. (Individual, Annabella, UT - #A30323.53100)

1596. Public Concern: The Forest Service should not risk human life to save private property.

Do not risk anyone's life to preserve property. Do not take heroic measures to protect houses with wooden shingles. (Individual, Dallas, TX - #A18002.35113)

Land Use Ordinances/Building Codes

1597. Public Concern: The Forest Service should encourage development of land use ordinances which keep residential development away from public lands.

As in the case of farms, protecting the forests from their neighbors will be a challenge, and will require the enactment of strong land use ordinances which keep residential development away from public lands. (Individual, Dallas, OR - #A3697.70110)

1598. Public Concern: The Forest Service should discourage settlement in roadless areas due to natural disaster risks.

We need, however, to strongly discourage new settlement in areas that carry risk of natural disasters such as forest fires. Every time such settlements happen, we have to compromise our wild areas a little more, in order to pick up the pieces for people who know better and are too irresponsible to care. (Individual, No Address - #A49.35000)

Protecting Communities: It is impossible to change the course of the power of nature, the best way to protect communities is to carefully plan and restrict proximity to the current roadless areas. (Individual, Aurora, CO - #A538.35000)

If people choose to move into those regions, there probably is no way to protect them. The best course is to discourage developers from building in areas that are prone to recurring natural disasters. (Individual, Gaithersburg, MD - #A5191.35130)

BY MAKING PRIVATE DEVELOPMENTS LESS QUALIFIABLE FOR RECOVERY INSURANCE

One suggestion is to make such developments less qualifiable for recovery insurance. (Individual, Astoria, OR - #A476.35000)

1599. Public Concern: The Forest Service should revise building codes.

TO SET A STANDARD FOR CONSTRUCTION IN FIRE-PRONE AREAS

Building codes should be revised so as to set a standard for construction in these areas considered as fire prone, not unlike that which has taken place in states where hurricanes and floods occur. The Federal Emergency Management Agency should also become engaged along with the private insurance industry. (Individual, Coulterville, IL - #A114.35000)

TO PROHIBIT CEDAR SHINGLES FOR ROOFING

Change building codes so people can't use cedar shingles for roofing in the wildland/urban interface. (Individual, No Address - #A26979.35220)

1600. Public Concern: The Forest Service should work with the homebuilding industry to ban roofs that put people at risk from fires.

The Forest Service should also work with the homebuilding industry to ban roofs that put people at high risk from fires. (Organization, Seattle, WA - #A19395.35210)

1601. Public Concern: The Forest Service should alleviate fire danger to private property through integration of diverse biological systems into the building material's infrastructure.

By protecting forests we will indirectly protect communities, homes and property through the stabilization of the atmosphere. Unstable atmospheric or ocean-atmospheric turbulence can devastate entire communities, homes and properties. The threat of bush fires on property is of trivial concern. Such concern may be alleviated through correct integration of diverse biological systems into the material infrastructure. (Individual, Curtain Act, Australia - #A29708.35000)

1602. Public Concern: The Forest Service should require property owners to consent to a conservation easement on their property.

TO EMPHASIZE PROTECTION AND PRESERVATION OF NATURAL FORESTS

Property ownership implies motivation for maximum economic benefit. With that in mind, property ownership is most often incompatible with the goals and values of Roadless Area Conservation, unless that ownership consents to an effective conservation easement in perpetuity, which will put the interests of protection and preservation of natural forest values first. (Individual, Goldendale, WA - #A21668.35300)

Urban-Forest Interface

1603. Public Concern: The Forest Service should identify urban-forest interface areas and develop appropriate management prescriptions for them.

TO REDUCE THE RISK FROM WILDFIRE

In the Forest Plan, urban-forest interface areas should be identified and appropriate prescriptions developed for the management of these areas. The Forest Service is developing fire management plans to reduce the risk from wildfire in many urban-forest interface areas. Roadless areas should be included as an integral part of the fire plan and updated annually and published in the Federal Register. However, fire plans should be consistent with Forest plan direction. If fire plan proposals go beyond plan direction, plan amendments should be considered. (Civic Group, Roanoke, VA - #A1713.30400)

1604. Public Concern: The Forest Service should protect roadless areas as a buffer between wilderness and the urban-forest interface.

The roadless forests are a wild wilderness I can't visit easily these days as back packing becomes more physically difficult. They are a buffer between Wilderness and the urban interface—they are easily accessible year round for recreation, whereas the higher Wilderness is in deep snow half the year. We go hiking, camping, backpacking, canoeing, bird watching, wildlife viewing. We go there to be in touch with Nature. My grandkids are growing up in these forests as my daughter did and I did. (Individual, Peshastin, WA - #A22973.45100)

1605. Public Concern: The Forest Service should establish buffer zones between private property and roadless areas.

Future developments in such areas: A buffer zone around such roadless areas should be established with incentives limiting the amount of future development in that area. (Individual, Astoria, OR - #A476.35000)

If you follow some 'safe and sane' logging practices, so called 'breaks' could be developed between 'roadless' areas, and private property. (Individual, No Address - #A834.35000)

Where feasible, fire roads could divide federal from private properties (not roads for transit, but to minimize fire spread). (Individual, Whitefish, MT - #A924.35000)

Work with local communities, and property owners to provide "fire breaks", and educate them as to the dangers involved. (Individual, Tucson, AZ - #A936.35000)

Buffer zones near inhabited areas are appropriate in these areas. This may include areas of cutting/roads 1-3 miles around inhabited areas. JUST DON'T DEVELOP THE BUFFERS or they will not be effective and will have to be expanded. This is simple logic. It is our ever-expanding development that creates these problems, not the existence of undeveloped forest. (Individual, Arlington, MA - #A1152.35000)

THAT ARE 500 FEET WIDE

The IRA land adjacent to local communities and private property should be managed to provide vegetative transition zones, which are narrow "fireproof" buffers about 500 feet wide. These zones would be logged, thinned, and burned to remove and reduce the connective fuels that endanger the communities and/or private property. (Individual, Libby, MT - #A2301.35200)

IN THE FORM OF A REVERSE GREENBELT

Land use planning/zoning laws should be in place to prevent the concentration of developments adjacent to roadless areas. At a minimum, there should be some requirements for some buffers so that when wildfires do occur, the developments won't be in such grave danger. Perhaps a "reverse greenbelt" between developments and roadless areas would be useful so essentially a fire line is maintained at all times. (Individual, Olympia, WA - #A26693.35110)

BY MAINTAINING MINIMALLY URBANIZED AREAS AS BUFFER ZONES

Roadless areas should be managed in such a way that does not "protect" forests from the very natural elements of fire, insects, and disease. Recognizing the full realization of such a plan would be extremely difficult, forests should begin to be managed from a "macro" perspective—understanding and managing external factors that contribute to the proliferation of potentially detrimental elements. Examples include the poorly conceived agricultural practices that stimulate the spread of plant disease and/or explosion of insect populations: as well as tradition of fire suppression that leads to dramatic fuel loading, such as that seen in the Tahoe Basin.

Typical roadless areas are already surrounded by regions that are largely rural, with minimal incursions. Such minimally urbanized areas should be maintained as buffer zones between roadless areas and human communities. Creation of carefully selected "unmanaged zones"—areas where disease prevention, fire suppression, and insect control are not practiced—should be implemented in conjunction with accompanying buffer zones—where more standard management practices exist—thus allowing the buffer areas to act as transition zones from roadless areas to more urbanized regions. This transition zone would provide a measure of protection to both human communities and to the roadless areas. (Individual, Reno, NV - #A27290.30100)

BY PURCHASING INHOLDINGS

If there is an unreasonable threat to private land then offers should be made by the federal government to buy this land up, acknowledging the risk run by holding the property and to employ it as a buffer zone. (Individual, Lexington, KY - #A1077.35200)

IF THE ADJACENT PRIVATE PROPERTY VALUES WARRANT SUCH PROTECTION

This "buffer zone" investment should only be employed where the adjacent private property values warrant, and there's a mutual fuel-reduction effort done. If a low-value, small piece of private property is involved, then a land exchange proposal is more appropriate. (Individual, Libby, MT - #A2301.35200)

1606. Public Concern: The Forest Service should allow private communities to construct buffer zones.

TO PROTECT PRIVATE PROPERTY

Communities near roadless areas should build firebreak areas, clearing brush, planting lawns, etc. Private property owners should do the same. (Individual, No Address - #A23569.35230)

1607. Public Concern: The Forest Service should consider ski areas located adjacent to communities as modifications supporting and complementing fire protection.

IN THE URBAN-FOREST INTERFACE

The very nature of this category requires local jurisdiction. It is inconceivable that this issue could be properly handled, addressed, or otherwise considered at a national level. A more intensive vegetative management strategy surrounding communities is a necessity. Ski areas provide such an opportunity especially for those areas located adjacent to communities. Ski areas located adjacent to communities should be considered strategically placed modifications supporting or complementing fire protection measures in the Urban Wildland Intermix Zone. (Business, Mammoth Lakes, CA - #A30296.35000)

1608. Public Concern: The Forest Service should not fragment roadless areas by constructing buffer zones.

Roadless areas must not be fragmented by road building or firebreak building, but other firefighting techniques should be approved. (Individual, Port Angeles, WA - #A6179.35230)

1609. Public Concern: The Forest Service should recognize that extensive vegetation management in forest-urban interface areas does not reduce potential home fire losses.

Extensive wildland vegetation does not effectively change home ignitability. The evidence suggests that wildland fuel reduction for reducing home losses may be inefficient and ineffective. Inefficient because wildland fuel reduction for several hundred meters or more around homes is greater than necessary for reducing ignitions from flames, and ineffective because it does not sufficiently reduce firebrand ignitions.

To be effective, given no modification of home ignition characteristics, wildland vegetation management would have to significantly reduce firebrand production and potentially extend for several kilometers away from homes. To reliably map wildland-urban interface home fire loss potential, home ignitability must be the principal mapping characteristic.

The 1995 USDA Forest Service Strategic Assessment of Fire Management describes a costly, intensive and extensive wildland urban interface (WUI) hazard mapping and mitigation effort specifically for reducing home fire losses. As described, this approach is not necessary.

A WUI area could be a high priority for extensive vegetation management due to high aesthetic, watershed, erosion, or other values, but not for reducing potential home fire losses. (Organization, Spokane, WA - #A18013.35200)

1610. Public Concern: The Forest Service should focus on other management activities besides urban-forest interface activities.

IN REGION 5

Protection of home and property has been focused on urban interface in Region 5. In my opinion no protection for property and communities of rural nature has been provided for. They are being squeezed out by regulation and financial strangulation. I believe that many decisions that have been made in the recent past would not pass the test of being what a prudent man would do if [this] were his land. (Individual, Carson City, NV - #A21959.35130)

Urban-Forest Interface – Funding

1611. Public Concern: The Forest Service should stop its misuse of the emergency fuels management funding earmarked for the urban-forest interface zone.

ABUSE OF EMERGENCY FUNDS

Last year Congress appropriated an additional $120 million for fuels reduction projects in the urban-wildland interface zone. Instead of directing resources to protect communities, however, the Forest Service is using emergency monies for large-scale commercial timber sales in the nation's most pristine forestlands, including roadless areas, old growth forests, and habitat critical to imperiled species—areas far from homes and businesses and at least risk of catastrophic wildfire. In testimony before Congress, the agency admitted that only 25 percent of the acres treated were in urban-wildland interface areas. (Individual, Washington, DC - #A30150.75610)

Public Collaboration

1612. Public Concern: The Forest Service should work with local agencies to plan for and combat natural disasters near private property.

How should communities and private property near inventoried roadless areas be protected from the risks associated with natural events, such as major wildfires that may occur on adjacent federal lands? By working with local and federal agencies to plan for emergencies. (Individual, No Address - #A850.35000)

In the unlikely event that adjacent property is threatened by wildfire on Federal lands, the Forest Service should cooperate with state and local agencies to bring the fire under control. (Business, Palmer, AK - #A942.35200)

Communities and private property near roadless areas have a certain risk from wildfire — as they always have. We are not changing their risk level by NOT building more roads. Continued cooperation between the federal government and local entities should continue to reduce fire-loss risk. If fuel reduction is deemed necessary it should be done by aerial means. (Individual, Bozeman, MT - #A1134.35200)

THROUGH LOCAL FIRE MANAGEMENT PLANS

Private property is protected through the state forest fire protection program. The decision on whether to initiate aggressive fire management in non-roadless areas should be a component of the local fire management plan. (Individual, Lolo, MT - #A111.35200)

THROUGH AN ESTABLISHED EDUCATIONAL PLAN

The Forest Service should have an Educational Plan that is given to every resident in these surrounding areas and work with these communities to get them involved with the care and protection of the forest and their own properties. The Forest Service has done a superb job of protecting communities this year. (Individual, Lopez Island, WA - #A15240.35110)

THROUGH FIRE PREVENTION SEMINARS

The Forest Service should put on fire protection and prevention seminars with state, tribal and local leaders and fire personnel, involving homeowners and developers in risk areas. (Business, Mc Bain, MI - #A12006.30610)

BY CONSULTING OFFICIALS IN NEW MEXICO AND MONTANA

The Natural Resource Conservation Service employs an on-the-ground "work with" attitude that was once the norm within the Forest Service. The idea should be to cooperate with how local communities and/or states interact with healthy forests not after the fact of catastrophic natural events, but in

preparedness of such events. Areas in New Mexico such as Otero County and in Montana around the Bitterroot that have first hand experience with this point should be able to give the WO Forest Service employees real life scenarios on what property owners and the service can do in relation to forest management protocols. (Individual, Rock Springs, WY - #A15658.35210)

1613. Public Concern: The Forest Service should work with other federal agencies to implement better land use planning.

The US Forest Service needs to work with other federal agencies to implement better land use planning. Because local communities have failed so miserably at land use planning in this regard, federal guidelines are needed. (Individual, Victor, ID - #A20625.35210)

1614. Public Concern: The Forest Service should keep a log of nearby property owners.

IN ORDER TO SEND THEM A LIST OF EMERGENCY CONTACTS

It is their job to protect themselves really. They chose to live there. Give them what a lot of agencies have, keep their name and phone number on a permanent log that is updated every 2 years, send them a list of emergency phone numbers. (Individual, Yelm, WA - #A17978.35230)

1615. Public Concern: The Forest Service should view private inholders as partners in forest stewardship.

Private inholders should be seen as potential partners in forest and wildlife habitat stewardship. (Individual, Brimley, MI - #A3659.15111)

Responsibility for Protecting Private Property

Summary

Responsibility of the Forest Service versus Private Property Owners – Numerous respondents state that the Forest Service should take steps to protect private property from natural disasters. To that end, people suggest a number of actions the Forest Service could take—coordinating efforts with residential and rural firefighting teams; employing science-based management decisions; revising regulations and legal authority as necessary to secure timely measures; establishing quick response procedures; providing adequate maps of roadless areas; conducting an inventory of communities located near roadless areas; allowing forest management decisions to be made at the local level; enlisting the aid of the National Guard; enlisting the aid of Forest Service research stations; constructing roads for access; thinning dense stands near communities; carrying out prescribed burns; maintaining a 'defensible space' from the boundary of private property to the forest; prohibiting structures within 200 feet of private property boundaries; clearing hazardous materials near communities; creating jobs that enable people to remove fuelwood; and providing local water access for fire hoses.

A number of individuals also suggest the Forest Service should educate private property owners regarding the dangers that exist in roadless areas and the steps they should take to protect their property. One person suggests the Forest Service use *Living with Fire* as a guide in its education efforts, while another person suggests hiring displaced timber workers to train private property owners.

In addition to taking steps to protect private property and educating private property owners, one person suggests that forest managers should be held accountable for "decisions [regarding development in roadless areas] that create dangerous situations."

Of those who specifically address the question of whether the Forest Service or private property owners should bear the responsibility for private property protection, most say it is private property owners that should bear the major responsibility. A typical comment is the following: "People should not build communities or buy property so near a national forest that they endanger their lives and property. If they do, they do so at their own risk." Some suggested actions private property owners can take include clearing a safe area around their property, providing fire lookouts, establishing fire and rescue departments, and developing fire management plans and stricter building and zoning codes.

Financial Responsibility – Several respondents say the Forest Service should bear the financial responsibility for damages to private property. One individual states, "If the Forest Service acts irresponsibly and allows disease or insects to spread they should be ready to pay for the damage it does to the private property owner." Another person concludes that the, "USFS must pay property owners full value for private property damaged by fire or other calamity originating in nearby National Forests, or if the property owner so requests, must rebuild damaged or destroyed property to original condition at USFS expense." Still another respondent suggests that "the Forest Service should establish a trust fund to replace, in-kind, these property amenities."

Some individuals suggest ways the Forest Service can help fund fire prevention efforts. One individual suggests that "the best way to protect people from wildfires is to develop a program where people are provided funding to clear out the fuels around their home." Another individual recommends that "communities should get a royalty from the extractive industry to fund a safe community." Finally one individual suggests that in the event of a natural disaster, federal funds should be used to "move people temporarily to safe areas . . . and to provide financial assistance in permanently relocating them to safer areas." This individual states that it is more "cost effective . . . to adapt to nature" than to waste energy fighting it year after year.

Other respondents assert that private property owners, not taxpayers, should bear the financial responsibility for fire protection. According to one individual, "People who own private property near roadless areas should accept that fires are a risk of the location they have chosen. Taxpayers' dollars should not be spent to protect a handful of homes, or to stop a wildfire that is natural in occurrence." Similarly, another individual states that "people who want to have a fire break between their house and an adjacent national forest should put one in their own land at their own expense, not go whining to the government to waste our tax dollars and our land to protect them from natural and predictable events." To that end, one person suggests that "private property owners should be assessed an annual fee and a service charge when they call for assistance." Another suggests that states raise property taxes for homes near forested areas to cover firefighting costs. According to others, private insurance companies should be encouraged to either increase rates or refuse coverage for homes built in locations at risk of wildfire, or offer reduced rates to those that meet fire danger reduction standards.

Responsibility of the Forest Service

1616. Public Concern: The Forest Service should protect private property from natural disasters.

Homeowners who have built homes on private property and who pay taxes for fire protection should have their homes protected, regardless of location. Otherwise, they are being denied their rights. (Individual, Salt Lake City, UT - #A806.35000)

Because of the increased risk from wildfires caused by unmanaged fuel loads, the Forest Service has the obligation to fight both fires and epidemics near private property to assure they do not spread to private land. (Individual, Sandpoint, ID - #A5438.35210)

Communities private property near inventoried road areas should be protected from the risks associated with natural events, such as major wildfires that may occur on adjacent federal land by, again, using helicopters. (Individual, No Address - #A536.35000)

AFTER DETERMINING THE RISK INVOLVED

Each situation is different and needs to be evaluated as such. What the risk involved is, needs to be determined before communities' private property are protected from wild fires. (Individual, Vancouver, WA - #A389.35000)

THROUGH COORDINATION BETWEEN RESIDENTIAL AND RURAL FIRE-FIGHTING TEAMS

Coordination between residential and rural firefighting teams is in order too. (Individual, Olympia, WA - #A20844.35000)

THROUGH SCIENCE-BASED MANAGEMENT DECISIONS

The Forest Service, at the local level, must make science-based management decisions that minimize the risk of catastrophic wildfires on neighboring forests, inholdings, and communities. Some of these decisions may require temporary roads. The January 2001 RACR could overly restrict science-based solutions to local problems. (Individual, Logan, UT - #A13482.35110)

BY REVISING REGULATIONS AND LEGAL AUTHORITY AS NECESSARY TO SECURE TIMELY MEASURES TO PROTECT PRIVATE RESOURCES

When it is necessary to respond to catastrophic events such as lethal, stand replacement fires, flash floods, water contamination, or others, time is of the essence. After a catastrophic event has occurred, is not the time to attempt resolution through arguments, appeals, and lawsuits. I believe that revision of regulations and modification of legal authority are necessary to secure timely measures to protect both private and public resources. (Individual, Colfax, WA - #A5421.35000)

BY ESTABLISHING QUICK RESPONSE PROCEDURES

I am an owner of land adjoining the Gallatin National Forest. In 1994 over half (about 1200 ac.) of my ranch was burned by fires sweeping from the Federal Land (The Black Butte Fire in Sweetgrass County, Montana). It was disappointing and disastrous that when the fire was just starting the local Big Timber Volunteer Fire Dept. was not able to drive to the fire and could have put it out, but were ordered not to, as it was on federal land and there was a liability issue. As a result, because of slow response by the federal government, and firefighters who did not know which township they were in, and abandonment of the initial fire with no safety net of a hand or machine line (all the crew left to save a barn.), the wind changed, and 11,000 acres burned, mostly private land.

The above explanation is to show that roads and quick response, even if it means deputizing local forest fighters could save private property. (Individual, Bozeman, MT - #A8826.30400)

BY PROVIDING ADEQUATE MAPS OF ROADLESS AREAS

Forest managers do have a responsibility to manage our national forests. But in carrying out those responsibilities, they must consider the impact those policies have on those living in close proximity to our national forests. Providing accurate mapping of roadless areas is a key ingredient to ensuring that communities and forests can coexist safely for all concerned. (Organization, Huntsville, AL - #A13542.35113)

BY CONDUCTING AN INVENTORY OF COMMUNITIES LOCATED NEAR ROADLESS AREAS

The Forest Service, working in concert with other fire fighting organizations, should first determine where such communities and property exist. Without such an inventory it is difficult to determine appropriate strategies and attendant costs. (Individual, No Address - #A12607.35200)

BY ALLOWING FOREST MANAGEMENT DECISIONS TO BE MADE AT THE LOCAL LEVEL

The USFS can best protect communities and private property near inventoried roadless areas by considering both economic and physical impacts of management decisions. Many communities and individuals depend on the sustainable use of these lands for their livelihood, and the USFS must give these national forest neighbors meaningful opportunities to comment on decisions about federal lands that may place them in economic or physical peril. Again, forest management decisions made on the local level are best suited to protecting adjacent rural communities, as they are more likely to have sufficient management flexibility to respond to emergencies and changed conditions. (Association, Sacramento, CA - #A3681.35110)

BY ENLISTING THE AID OF THE NATIONAL GUARD

How should communities and private property be protected from wildfires on adjacent federal lands?

Through trained Forest Service personnel, available army reserves and national guard, local fire service, police, etc. paid for with proceeds from the Emergency Management System, State and Federal reserves from sales of natural resources, insurance policies on projects that are casual, and use permits of resource lands. (Individual, Lacey, WA - #A17762.35000)

BY ENLISTING THE AID OF FOREST SERVICE RESEARCH STATIONS

The Forest Service Research Stations can play a role in reducing problems in the interface between roadless areas and neighboring state, tribal, community or private developments by conducting scientific research in ways to reduce risks. (Individual, Asheville, NC - #A22623.35210)

BY ALLOCATING RESOURCES

Fire fighting resources should be allocated heavily in favor of protecting forests close to towns and private property. Most of these areas are roaded and not covered under this plan. (Individual, Lehi, UT - #A568.35000)

BY MANAGEMENT ACTIVITIES

I believe that some thinning of areas near private property is prudent along with controlled burns to reduce the fuel load. (Individual, Missoula, MT - #A113.35000)

Protecting property, communities and homes are important. The underbrush and small trees should be thinned to reduce possibility of the ladder effect that causes crown fires that are almost impossible to control. (Individual, Coulterville, IL - #A114.35000)

Communities and private property near roadless areas are the areas most in need of fire protection work such as thinning, etc. (Individual, Coram, MT - #A539.35000)

Management of national forests should not pose risks, if possible, to adjacent private lands or communities. Therefore, management activities should be accomplished that reduce risks of catastrophic wildfires and insect and disease infestations. The Forest Service must analyze potential impacts on communities and private property and these communities and private owners must be provided opportunities to comment on decisions about federal lands that might place them at increased risk. (Individual, Thousand Oaks, CA - #A891.35000)

BY CONSTRUCTING ROADS FOR ACCESS

The Roadless Area Conservation Rule already provides exceptions that allow road building and logging when needed to address concerns of wildfires and forest health. Roads can be built to protect public health and safety from imminent wildfire threats and other emergencies. (Individual, Logan, UT - #A939.35000)

In instances where human life and property is threatened by keeping an area roadless, build roads. (Individual, Fayetteville, AR - #A1015.35000)

Roads can still be built to protect life or property. (Individual, Duluth, GA - #A3724.35000)

I understand how difficult it is to balance this issue, however, I also understand that the protection of communities and other private property should be but one factor in determining the way an event is dealt with. If this is at the expense of an area remaining roadless, so be it, an adequate number of temporary roads should be constructed to fight the fire, or insect infestation, or whatever. These roads can then be decommissioned and restored to their natural state at a later date or utilized as recreational infrastructure. We should be clever enough to remain somewhat fluid in how all our public lands are utilized, if a particular tract is no longer suitable for so-called "roadless" status perhaps it should be allowed to be used for other purposes. (Individual, El Dorado, KS - #A5117.35000)

BY CONSTRUCTING TEMPORARY ROADS FOR ACCESS

National Forests should be managed to be assets to the community, not liabilities. Protection of communities and other private property should be the primary factor in determining the way a fire is fought. If required to accomplish such protection, a minimum number of temporary roads should be constructed to fight the fire. These roads can be decommissioned and restored to their natural state later. Then, mitigation measures that address flash flood, mudflows and water contamination should be implemented quickly following wild fires. (Individual, Edgewood, NM - #A5638.35000)

BY THINNING DENSE STANDS NEAR COMMUNITIES

How should communities and private property near inventoried roadless areas be protected from the risks associated with natural events, such as major wildfires that may occur on adjacent federal lands?

Thin unnaturally dense stands near communities, but do not remove old-growth timber, only underbrush and small trees. (Individual, Dallas, TX - #A18002.30530)

BY REINTRODUCING FIRE

Owners of land adjacent to the national forest assume some risks as well as receiving a great deal of benefit. In many cases these landowners purchase this land just for the fact that it does lie adjacent to the national forest. Roading the existing roadless areas would not necessarily protect these lands and in many cases would actually detract from the values that the adjacent landowners have sought out. Roadless lands actually offer us our best opportunity for emulating natural fire processes without the threats to human habitation and other costly human development. By allowing the reintroduction of fire into these systems we can protect nearby landowners to a reasonable level. (Individual, Moscow, ID - #A4871.35100)

BY PRESCRIBED BURNS

To protect homes from the unlikely event of a forest fire near roadless areas, perhaps the Forest Service can create a program for prescribed burns in those areas where excess fuel loads appear to be a problem. This may also maintain forest health. (Individual, Colorado Springs, CO - #A17259.35000)

BY MAINTAINING A 'DEFENSIBLE SPACE' FROM THE BOUNDARY OF PRIVATE PROPERTY TO THE FOREST

The Forest Service should maintain a "defensible space" on the public lands from the boundary of the private land back into the forest.

They should consistently encourage private landowners to maintain their own defensible space around their structures. (Association, Cody, WY - #A41559.35100)

BY ZONING AND PROHIBITION OF STRUCTURES WITHIN 200 FEET OF PRIVATE PROPERTY BOUNDARIES

Pre-emptive measures should be taken to prevent damage on private properties. Some examples are, through zoning, and no structures should be erected within 200 feet of property boundary. (Individual, No Address - #A5395.35000)

Protection of adjacent lands can be achieved through intelligent planning and zoning of private and public lands. (Individual, Missoula, MT - #A6193.35000)

BY CLEARING HAZARDOUS MATERIALS 200 METERS FROM COMMUNITIES

Forest treatment beyond the immediate area surrounding houses has little effect on community protection from wildfire. However, an intensive zone 200 meters (660 feet or one-eighth of a mile) around communities can provide a defensible space and a potential fire line for firefighters. Treatment of the buffer areas should include the removal of ladder fuels (primarily smaller trees) and general fuels reduction. A light treatment for up to a .5-mile from urbanized areas may be appropriate. Larger trees, especially those in the ponderosa pine forests, have shown resistance to fire. (Organization, Chico, CA - #A25114.35200)

BY CLEARING HAZARDOUS MATERIALS 40-100 METERS FROM COMMUNITIES

The current proposed Roadless policy allows roads to be built in roadless areas to protect life or property. All the current research points to the areas WITHIN the first 40-100 meters surrounding a community as the place where clearing to prevent fires should be concentrated. (Individual, Nevada City, CA - #A11787.35000)

BY CREATING JOBS THAT ENABLE PEOPLE TO REMOVE FUELWOOD

If necessary, in roadless areas close to habitations, jobs could be created by sending people in without roads to remove fuel-wood. (Individual, Sitka, AK - #A15506.35200)

BY PROVIDING LOCAL WATER ACCESS FOR FIRE HOSES

I believe that building regulations would address this problem. For instance, homes in these areas would benefit from not having wooden roofs. There should be a perimeter of non-dense forest around the home, but not necessarily a clear-cut. There should be local water access for fire-hoses. (Individual, Klamath Falls, OR - #A6931.35200)

FOR HOMES THAT EXISTED PRIOR TO INCLUSION IN THE NATIONAL FOREST SYSTEM

In cases where communities or individual homes existed prior to their neighboring lands being included in the National Forest system, reasonable efforts should be taken to assist in maintaining buffer zones to inhibit the spread of fires into inhabited territory. (Individual, New Haven, CT - #A616.35000)

ON THE LITTLE MISSOURI NATIONAL GRASSLANDS

We live adjacent to the Little Missouri National Grasslands and expect the Forest Service to be a good neighbor and manage it properly so it does not jeopardize our personal property and personal safety. A response plan should be implemented to effectively deal with the potential for wildfires, disease, etc. (Association, Watford City, ND - #A29131.35000)

AT THE BRUNDAGE MOUNTAIN SKI RESORT

The forest planning process may need to provide exceptions to roadless area prescriptions in order to provide for circumstances of this nature. In many cases, such as ours, ski resorts are private improvements located on federal lands that need fire protection. Indeed, the Forest Service has historically provided fire suppression in the event of natural fires within and adjacent to Brundage Mountain and we would like to see this practice continues. (Permit Holder, McCall, ID - #A15317.35210)

1617. Public Concern: The Forest Service should educate private property owners regarding the dangers that exist in roadless areas.

Communities must protect themselves economically, the only thing the forest service can do is to educate the public about various perils. (Individual, Fruita, CO - #A1680.35113)

AND THE STEPS THEY SHOULD TAKE TO PROTECT THEIR PROPERTY

People in these areas should be educated about how to protect the area they live in, how to minimize the risk of dangerous fires and what to do and who to call if a fire should break out. (Individual, Shawnee Mission, KS - #A96.35113)

Ideally people should be supplied with a notice warning them about the increased risk of fire due to their choice of location before they buy a home. All property owners should receive documentation on how to best protect their property such as using fire resistant roofing materials, type and closeness of vegetation near their homes, etc. Determine levels of protection depending on density of population. An isolated home, regardless of value, should not be given the same level of protection as a densely packed community. The bottom line is always risk vs. reward. (Individual, Tucson, AZ - #A4938.35113)

I also have to ask the question of what communities and homeowners can do to protect themselves from the ravages of fire. They should treat their community and private properties by thinning and removing small trees and all underbrush from their properties at a minimum of at least 500 feet or more. Roofs and gutters should be free of flammable material such as leaves and pine needles. Nothing flammable should be close to a structure. (Individual, Coulterville, IL - #A114.35000)

Remind homeowners that they are responsible to harden their properties against wild fires. They must: a) use metal or tile shingles, b) use metal or concrete containing siding, c) keep brush away from their homes, d) keep trees away from homes, e) keep water on-hand to fight fires. (Individual, Olympia, WA - #A441.35000)

A landowner who purchases or acquires property anywhere near federal forests and grasslands should know the risks and take measures to reduce wildfire damage to their property. USFS research by fire physicist Jack Cohen shows clearly that structures can be most effectively and efficiently protected from fire by working within the structure's defensible space zone. This is within 25 meters from the house. (Individual, Grangeville, ID - #A830.35000)

The Forest Service should also have an aggressive program to work with local home owners on ways to protect their homes, like removing dead and dying trees, maintaining a "green area" within 30-50 feet of the home, and having a metal roof. (Elected Official, Fremont County, ID - #A4942.35200)

BY USING *LIVING WITH FIRE* AS A GUIDE

According to the Forest Service, protection from wildfire is best achieved by managing the vegetation immediately surrounding structures. The Forest Service could therefore provide education to nearby property owners on ways to protect themselves with roof sprinklers, and defensible space. In Minnesota, wildland firefighting agencies developed a guide for homeowners called Living With Fire. The guide describes the forces that determine wildfire behavior and lists specific steps to creating an effective defensible space around homes. (Individual, Grand Marais, MN - #A15355.35113)

BY HIRING DISPLACED TIMBER WORKERS TO TRAIN LANDOWNERS

Hire displaced timber workers to train folks living in the wildland/urban interface how to reduce fire hazards around their homes. (Individual, No Address - #A26979.35220)

1618. Public Concern: The Forest Service should protect federal property with private improvements from natural disasters.

SKI RESORTS

Federal property with private improvements, like those at ski areas need protection from risks associated with natural events just as private property owners do. The agency should have the flexibility to prevent and control fires in adjacent areas and should consider a less rigorous ban on road building in roadless areas adjacent to private property and communities. (Permit Holder, Denver, CO - #A15385.35210)

1619. Public Concern: The Forest Service should hold forest managers accountable for decisions that create dangerous situations.

Forest Service managers are not thinking coherently about development and fires. For example, the Targhee National Forest is attempting to create a private inholding at Grand Targhee resort through a

federal land exchange. This private inholding would be completely surrounded by forests, 7 miles within the forest boundary by road and many more miles from county fire-fighting equipment. When others and I raised the issue of risk to this new development from wildfire, the Targhee simply dismissed our concerns both during the EIS process and in our appeal of the decision to privatize Grand Targhee. Forest managers lack accountability for decisions that create dangerous situations. Regional foresters just close their eyes to the problem. (Individual, Victor, ID - #A20625.35210)

Responsibility of Private Property Owners

1620. Public Concern: Private property owners should be responsible for protecting their property from natural disasters.

People should not build communities or buy property so near a national forest that they endanger their lives and property. If they do, they do so at their own risk. National forests were not created to accommodate communities or private property owners. They were created to preserve the national interest by providing unspoiled, undeveloped natural areas for all Americans, not just the few who financially profit from their proximity to national forests. (Individual, Ennis, MT - #A102.35000)

Property owners near roadless areas should accept the risk of living in such a vulnerable area and take responsibility for their own. Better yet, they should be encouraged to live in town. (Individual, Bozeman, MT - #A284.35000)

Communities and private landowners can fend for themselves. They need to be proactive in preventing risk and fire danger for themselves. They are aware of the risks when involving themselves in nearby roadless areas. (Individual, Missoula, MT - #A394.35000)

BY DIGGING TRENCHES AROUND THEIR PROPERTY

Private property owners (by definition) should be responsible for protecting their properties by modifying their own lots if they so desire. Many private residences bordering forests in the upstate NY area use lot-edge trenching to prevent fire spreads. Such trenches should be suggested to land owners, but should be done on the private lands, by the lot owner. (Individual, Rochester, NY - #A8831.35230)

BY PROVIDING FIRE LOOKOUTS

Communities and private properties near inventoried roadless areas can best protect themselves by maintaining adequate fire stations and lookouts, and access to dependable water resources. There is always fire danger associated with living near or in the forest. The potential for harm or destruction can never be entirely eradicated. Proper creation and maintenance of firebreaks, a sound emergency and fire protection plan, and a dependable water source, provide as much protection as possible to create in forests. (Individual, Chewelah, WA - #A5453.35230)

BY ESTABLISHING FIRE AND RESCUE DEPARTMENTS

Local communities should be properly protected from the hazards associated with living in these areas by proper management. If item number three is carried out properly, the only danger will be acts of nature. The communities should be properly insured and have a well-maintained fire and rescue department. This can be accomplished by their individual mechanisms. (Individual, Boulder, CO - #A5288.35000)

BY DEVELOPING FIRE MANAGEMENT PLANS AND STRICTER BUILDING AND ZONING CODES

Local communities must have their own fire management plan. More responsibility, accountability for fire prevention and invasive species must be placed on the owners of private lands. Local laws need to coincide with these responsibilities such as no wood roof in the forest, no building in a flood plain, etc. (Organization, Reno, NV - #A5987.35220)

1621. Public Concern: The Forest Service should allow private property owners to clear a safe area around their property.

Private property owners should be allowed to clear a safe area around their property, if desired, to provide protection from wildfires. (Individual, Albuquerque, NM - #A10497.10135)

UP TO 100 YARDS AWAY

I do have some green timber left. Because of the rough terrain, I would have to enter the forest perhaps 100 yards to reach a point where I could come back into my property in order to harvest the trees. I think permission should be given to private forest owners, to do this. (Individual, Bozeman, MT - #A8826.40000)

Financial Responsibility

1622. Public Concern: The Forest Service should pay for damages to private property if they allow disease or insects to spread.

Spraying can be done at the first outbreak of insects or disease to minimize the spread to forests and private lands. If the Forest Service acts irresponsibly and allows disease or insects to spread they should be ready to pay for the damage it does to the private property owner. (Individual, Oak City, UT - #A40530.30600)

1623. Public Concern: The Forest Service should pay private property owners for property damaged by wildfire.

USFS must pay property owners full value for private property damaged by fire or other calamity originating in nearby National Forest, or if the property owner so requests, must rebuild damaged or destroyed property to original condition at USFS expense. This USFS insurance requirement also must include death, damage and injury caused to people, property or livestock, by wild animals and diseases which emerge from National Forest land. (Individual, Fredericktown, MO - #A11981.35230)

1624. Public Concern: The Forest Service should provide funding to private property owners.

TO CLEAR FUELS AROUND THEIR HOME

The best way to protect people from wildfires is to develop a program where people are provided funding to clear out the fuels around their home. This is best seen in the Conservation and Local Economy Alternative provided on the Bitterroot National Forest in response to their Burned Area Draft Environmental Impact Statement. Non-Commercial thinning in the urban/rural interface should be determined by local scientists. (Individual, Missoula, MT - #A21068.35100)

1625. Public Concern: The Forest Service should provide royalties from extractive industries to communities near roadless areas.

Private landowners elected to buy land there next to a forest should take precautions to protect their own lands. Communities should get a royalty from the extractive industry to fund a safe community. (Individual, Mesa, AZ - #A99.35230)

1626. Public Concern: The Forest Service should use federal funds to relocate private property owners to safe areas.

IN THE EVENT OF A NATURAL DISASTER

Regarding the threat to people and property posed by natural disasters, such as wildfires, we should use federal funds to move people temporarily to safe areas in the case of such events, and to provide financial assistance in permanently relocating them to safer areas. Our experience with the Mississippi floodplain has shown that it is cost effective, as well as simply wise, to adapt to nature, rather than waste

our energies countering elemental realities that will return year after year. (Individual, Washington, DC - #A27348.35210)

1627. Public Concern: Private property owners, not taxpayers, should bear the cost of fire protection.

Homeowners and other property owners within National Forests should bear some if not all of the expense associated with fire protection of their own property, as are property owners in other parts of the country. Local people must be treated respectfully as neighbors, but they are not landlords. (Individual, Skokie, IL - #A529.35230)

The best way to prevent the urbanization of roadless areas is to require risky property owners to assume the risks. We don't need another Federal welfare program for landowners such as coastal and wetland settlers receive! (Individual, North Little Rock, AR - #A814.35230)

People who own private property near roadless areas should accept that fires are a risk of the location they have chosen. Taxpayers' dollars should not be spent to protect a handful of homes, or to stop a wildfire that is natural in occurrence. (Individual, Portland, OR - #A967.35230)

Communities are not typically adjacent to national forest roadless areas, so they do not require special protection from fire and other events. Private lands are, in fact, private. Special fire protection, and the resultant costs, should be left to the individuals and/or corporations who own those lands. (Individual, Bozeman, MT - #A3673.35230)

People who want to have a fire break between their house and an adjacent national forest should put one in their own land at their own expense, not go whining to the government to waste our tax dollars and our land to protect them from natural and predictable events. (Individual, West Lebanon, NH - #A4836.35130)

1628. Public Concern: The Forest Service should charge private property owners an annual fee and service charge for assistance.

I think private property owners should be assessed an annual fee and a service charge when they call for assistance. (Individual, Las Vegas, NV - #A5429.35200)

1629. Public Concern: States should raise property taxes for homes near forested areas.

TO COVER FIRE FIGHTING COSTS

The states should develop a way to better prepare their landowners for inevitable fires. They could, for example, develop a property tax scheme that would charge higher taxes for homes near forested areas to cover the higher fire fighting costs for those areas. They could also mandate fire insurance for all homeowners in a forested area. (Individual, No Address - #A29243.35120)

1630. Public Concern: The Forest Service should encourage private insurance companies to either increase rates or refuse coverage for homes built in locations at risk of wildfire.

There should be free market solutions to many of the problems created by homes being built in locations that are subject to high wildfire danger. Private fire insurance should either be very expensive or simply not available to those who wish to build in locations that have a very high risk of being destroyed by wildfire, either through remoteness or through their lack of typical fire protection such as distance from a fire department and access to water supplies, etc. At the very least there should be a determination by

local fire officials as to whether or not the structures can be defended without jeopardizing either men or equipment prior to an emergency. (Individual, West Yellowstone, MT - #A6043.35130)

1631. Public Concern: The Forest Service should encourage fire insurance carriers to offer reduced rates to those that meet fire danger reduction standards.

Encourage fire insurance carriers to offer reduced rates to homes that meet fire danger reduction standards. It's just crazy to offer the same rates to people with flammable and inflammable siding and roofs! (Individual, Olympia, WA - #A441.35000)

The Forest Service could seek the cooperation of insurance companies to reduce premiums for owners who reduce risk. National forest land in the urban interface should be made as fire resistant as practical to do so. (Individual, Missoula, MT - #A4987.35200)

Other

1632. Public Concern: Organizations opposed to access to roadless areas should protect communities and private property and assume liability for any loss.

Protection of nearby communities and private property should be provided by the Sierra Club and all others opposed to any trespassing of inventoried roadless areas, and be held libel for lost lives and lost property. (Individual, Fremont, MI - #A10610.35000)

Protecting Access to Property (*Question 5*)

Question 5: Protecting Access to Property. What is the best way to implement the laws that ensure states, tribes, organizations, and private citizens have reasonable access to property they own within inventoried roadless areas?

This section includes five subsections: Protecting Access to Property General, Access to National Forest System Lands Through Private Property, Maintenance of Routes through National Forest System Lands to Private Property, Legal Considerations, and Land Exchanges/Purchases.

Protecting Access to Property General

Summary

General Comments – One individual suggests that in order to preserve access to private property, property boundaries must first be established; hence, the U.S. Department of the Interior and Bureau of Land Management should survey the boundaries of private and federal property to establish adjoining boundaries. Beyond this technical suggestion, a number of respondents urge the Forest Service to ensure access to private property—through the forest planning process, through special use permits, or on a case-by-case basis. One association requests that any revisions to regulations not result in undue delays in access decisions, stating that "it has taken over two years for the Forest Service to issue a Road Use Permit to allow the use of three miles of existing Forest Service road on the Medicine Bow NF to access a timber sale in a State of Wyoming section inside an inventoried roadless area."

Others ask the Forest Service to notify private property owners when considering changes that could affect access to their property; to ensure that properties for sale are guaranteed access; to address access to parcels not presently accessible by road; and to oversee local residential access decisions in order to ensure compliance with statutory federal residential requirements, protections, and planning processes.

Some individuals also ask the Forest Service to spell out conditions of ingress and egress in forest plans, and to require private property owners to prevent interloping along routes of ingress and egress to their property. Additionally, one person comments that "property ownership does not bestow [on] owners a right to conduct activities on their lands in conflict with, or to the detriment of, adjacent ownerships," and urges the Forest Service not to allow such activities.

Roadless Area Management – A number of comments about access relate directly to roadless area management—specifically in connection with the Roadless Area Conservation Rule. Both a state agency and a professional society ask the Forest Service to address, on a forest-by-forest basis, the potential impacts of roadless area management on access to other public and private lands. At the same time, several individuals make a point of saying that the Rule would have no impact on access to state and private inholdings because access is already protected by existing

law. Some point to the provision in the Rule which provides exceptions to the prohibitions on road construction when necessary to maintain access to inholdings, and urge the Forest Service to retain that provision.

Others assert that the exceptions allowed in the Rule are not sufficient, and so urge the Forest Service to address the Rule's adverse impacts on private property access, or to revise the Rule to ensure that reasonable access routes to private property are maintained.

1633. Public Concern: The U.S. Department of the Interior and Bureau of Land Management should survey the boundaries of private and federal property.

TO ESTABLISH ADJOINING BOUNDARIES

All owners of private property must have access to their property. State law should prevail as individuals must allow other individuals access to their property, no fee should be charged. Property boundaries must be surveyed by the US Department of the Interior and BLM to establish all corners joining private and federal property; this is a continuing problem in our area. (Individual, Mount Ida, AR - #A13372.40000)

1634. Public Concern: The Forest Service should ensure access to private property.

THROUGH THE FOREST PLANNING PROCESS

The best way to ensure that States, tribes, and private citizens have reasonable access to property they own in roadless areas is through the forest planning process. Those routes of concern should be identified and protected through forest-wide goals, objectives and standards. The lands to be protected, and the access to them, should be clearly identified on the preferred alternative map. Those roads then become part of the road management system for the Forest. (Elected Official, Fremont County, ID - #A4942.40100)

THROUGH SPECIAL USE PERMITS

Why shouldn't we the people be able to use the forest areas? Forest planning may have failed to provide adequate protection of roadless areas in the past that proves we need improvement and a way to regulate such areas. The best way to implement the laws that ensures States, tribes, organizations, and private citizens have reasonable access to property they own is to design a use permit and use that money to cover the cost of policing the area. (Individual, No Address - #A4764.40000)

Establishment documents for Roadless Areas should contain identification of access routes and specifications for their development and use. If access will not be permitted then the holdings should be acquired by the government through negotiation or in the extreme, condemnation. The inholder should be compensated. The existing Special Use Permit system of the Forest Service should be adequate for these access situations. (Individual, Olympia, WA - #A278.40500)

ON A CASE-BY-CASE BASIS

You must provide reasonable access to private and other lands adjacent to or within the inventoried roadless areas. If you can't do this and maintain a unit's roadless character, it should not be managed as roadless. What constitutes reasonable access must be negotiated with each landowner. The issue of access to other properties must be addressed on a case-by-case basis in forest plans. (Individual, Lewiston, ID - #A2872.40000)

1635. Public Concern: The Forest Service should avoid additional delays regarding decisions on access to private property.

Because of delays associated with Forest Service roadless policies, it has taken over two years for the Forest Service to issue a Road Use Permit to allow the use of three miles of existing Forest Service road

on the Medicine Bow NF to access a timber sale in a State of Wyoming section inside an inventoried roadless area. This is inexcusable. Any revision of the regulation should not result in any additional potential delays for decisions on rights-of-way or access to private property. (Association, Augusta, ME - #A13312.40000)

1636. Public Concern: The Forest Service should notify private property owners when considering changes that could affect access to their property.

TO ALLOW PROPERTY OWNERS TO ASCERTAIN THE IMPACTS OF ROAD POLICIES

Owners of private inholdings must be specifically notified in writing, including maps with adequate detail, whenever the Forest Service considers changes which could affect access to or the values of their private properties. General notification procedures and practices are not adequate. They do not relate to specific situations and the Forest Service personnel who make these presentations, field comments, and attempt to answer questions have little knowledge of policies and procedures as they would apply to and affect specific inholdings. This has resulted in the inability for the owners of inholdings, like us, to accurately ascertain potential impacts of any road policies, procedures or proposals. Additionally, actual and existing road status information needs to be maintained and made available to interested and affected parties. Our experience is that this is not currently the case. (Individual, Lancaster, CA - #A18019.40000)

1637. Public Concern: The Forest Service should spell out conditions of ingress and egress in forest plans.

Access to private property should be subject to the same ridiculous, discriminatory laws that apply to wilderness areas. Reasonableness and common sense in determining the least impact on federal lands is the least cost to the land owner. The forest plan should spell out conditions of ingress and egress. (Business, Eureka, MT - #A17220.20400)

1638. Public Concern: Local governments should ensure that properties for sale are guaranteed access.

It is the responsibility of local governments to conduct land use planning that ensures properties for sale are guaranteed access. (Individual, No Address - #A27789.40100)

1639. Public Concern: The Forest Service should address access to parcels not presently accessible by road.

ON A CASE-BY-CASE BASIS

As I have reviewed the government maps of the federal lands around us here in Gunnison, I notice many parcels that are not accessed by roads, these parcels seem to have been purchased for mineral rights, grazing, spring access, etc. Access to these lands will need to be provided on a parcel-by-parcel basis. These decisions can be made by the local boards in connection with the owner, and all interested parties. Special education on the problems presented by access plans and requests should be given by the USDA foresters working in the area. (Individual, Gunnison, UT - #A25755.40000)

1640. Public Concern: The Forest Service should oversee local residential access decisions.

TO ENSURE COMPLIANCE WITH STATUTORY FEDERAL RESIDENTIAL REQUIREMENTS, PROTECTIONS, AND PLANNING PROCESSES

In the final proposed rule I hope you include extremely limited, or no, unguided local control for FS residential access decisions. Local control has meant no viable appeal to local FS actions. The local FS has minimal consultation with affected populations. The local FS is severely out of sync with other statutory federal residential requirements, protections and planning processes. Residential use is not the

FS's forte, yet it is important to residents that lawful and reasonable review of decision making prevail, even in the forest. (Individual, Prescott, AZ - #A28094.13120)

1641. Public Concern: The Forest Service should require private property owners to prevent interloping along routes of ingress and egress to their property.

Political and private interests who own land within inventoried roadless areas should have access but should bare the entire burden of ensuring that public lands are protected from interlopers along routes of ingress and egress to their properties. (Individual, Olympia, WA - #A10330.40000)

1642. Public Concern: The Forest Service should ensure that private property owners do not conduct activities that harm adjacent ownerships.

Property ownership does not bestow owners a right to conduct activities on their lands in conflict with, or to the detriment of, adjacent ownerships (i.e. hazardous waste management facilities erected adjacent to residential areas or access roads constructed across the public's roadless areas). (Individual, Kennewick, WA - #A23359.40100)

1643. Public Concern: The Forest Service should allow the advocates of non-wilderness use to compete for access to privately held lands.

The competition is over, and the advocates of non-wilderness uses of our National Forests have already mostly won. Preserve the remaining roadless areas as wilderness and allow the advocates of non-wilderness uses to compete for access to the majority of Forest Service land which remains unprotected. Calling these resources "limited" is misleading in this context. There are very few limits placed on the motorized recreation and resource extraction contingents in this competition. The majority of Forest Service land is open to these uses. Tracts of public land dwarfing the Forest Service holdings were granted to private interests in the last century—very little of which remains roadless. Allow the advocates of non-wilderness uses to compete on the free and open market for access to this privately held land rather than asking all Americans to, yet again, pick up the tab. (Individual, Seattle, WA - #A21681.15160)

Roadless Area Management

1644. Public Concern: The Forest Service should address, on a forest-by-forest basis, the potential impacts of roadless area management on access.

TO OTHER PUBLIC AND PRIVATE LANDS

The potential impacts of known forest health problems, fuel load problems, and fire suppression needs on adjacent landowners must be considered in the development of roadless area management decisions. The Forest Service must also address, on a forest by forest basis, the potential impacts of roadless area management on access to other public and private lands as well as to water supplies for operations, maintenance and public safety concerns. Similarly, diminished water yields and potential water quality problems associated with catastrophic wildfires must also be rectified. (State Agency, Denver, CO - #A2332.30200)

The Forest Service must address, on a forest-by-forest basis, the potential impacts of roadless area management on access to other public and private lands. Although it might seem an obvious consideration to account for, the original scoping roadless policy document lacked strong assurances and safeguards for in-holding access. The final policy adopted a more positive approach, but still left much to be desired in terms of process. (Professional Society, No Address - #A29920.40100)

1645. Public Concern: The Forest Service should recognize that the Roadless Area Conservation Rule has no impact on access to state and private inholdings.

The Roadless Area Conservation Rule has no effect on access to state and private land inholdings. Roadless areas are no different from any other national forest lands regarding inholding access. The Bush administration should not be perpetuating the myth that the Rule denies access to property inholdings. (Individual, Denver, CO - #A4524.40000)

The Roadless Area Conservation Rule won't affect access to inholdings owned by states, tribes, organizations, and private citizens. Inholding access is the same on roadless areas as it is on other national forest lands. Despite the Bush Administration's claims, it's a myth that the Roadless Rule denies access to property inholdings. (Individual, Hewlett, NY - #A4748.40100)

BECAUSE ACCESS IS ALREADY PROTECTED BY EXISTING LAW

One of the points being raised by the current Administration is the issue of access to private and state lands through national forest lands. This issue is a false issue. Access is protected by current laws, already on the books, and has no bearing on the current roadless area designations. (Individual, Jackson, WY - #A1719.40100)

1646. Public Concern: The Forest Service should retain the provision in the Roadless Area Conservation Rule which provides exceptions to the prohibitions on road construction when necessary to maintain access to inholdings.

The Roadless Area Conservation Rule currently has a provision that provides exceptions to the prohibitions on road construction to assure access to state, tribal, and private lands across inventoried roadless areas. It states that road construction is allowed when a road is needed pursuant to reserved or outstanding rights, or as provided for by statute or treaty. We support retention of this provision of the Roadless Area Conservation Rule. This provision may be clarified with language that specifically includes access to state, tribal, and private lands across roadless areas. (Individual, Asheville, NC - #A22623.40000)

1647. Public Concern: The Forest Service should revise the Roadless Area Conservation Rule.

TO ENSURE THAT REASONABLE ACCESS ROUTES TO PRIVATE PROPERTY ARE MAINTAINED

The state understands that the Roadless Rule is written as a blanket prohibition, with some exceptions allowed. However, the exceptions do not cover future activities, only existing rights. Second, and more importantly, the state does not believe that the exceptions, as written, will have the desired effect. For example, law and equity require access to inholdings within the forest. If the owner of an inholding desires access to the land, the Forest Service is obligated to allow the most reasonable route, considering environmental and economic factors. Unfortunately, rather than do this, which may require consideration of a new or reconstructed road, the tendency will be, borne out by years of experience, to strongly suggest that, because this is a "roadless" area, the ownership of the inholding be transferred to the Forest Service in some manner. Second, even if this is not the case, the most reasonable access may not be the most direct, and may have to be routed in order to avoid topographic features, such as cliffs. The Rule does not indicate any such criteria, or allow for such processes of review. (State Agency, Salt Lake City, UT - #A20742.40000)

1648. Public Concern: The Forest Service should identify roadless areas in private property deeds.

Roadless areas must be designated in the deed to the land so that all know what they are involved with. (Individual, Birmingham, AL - #A1111.40000)

1649. Public Concern: The Forest Service should recognize that the Roadless Area Conservation Rule has adverse impacts on private property access.

The existing rule inadequately assures that the valid existing rights individual landowners, states or tribes have to access their lands will be honored. (Individual, Juneau, AK - #A22284.40300)

1650. Public Concern: The Forest Service should prohibit home building in roadless areas.

Home-building should be prohibited not only in the roadless areas, but on the perimeter of the roadless areas as well. (Individual, Bozeman, MT - #A285.90110)

Access to National Forest System Lands Through Private Property

Summary

Several respondents discuss the need to maintain access through private property to public lands. They assert that public lands are sometimes landlocked by private property and that the public is then denied legitimate access. "Sometimes the area of private property to cross to get to the National Forest would only be 50 yards or so," states one individual. "But no access is allowed. Many public roads go up to locked gates." To address this problem, some urge the Forest Service to maintain public rights-of-way through private property when public land is bordered on all sides by private land. Likewise, one individual asks the Forest Service to prevent private property owners from blocking access to other private inholdings; and another asks the Agency to allow public access through private or tribal grazing allotments.

1651. Public Concern: The Forest Service should prevent public lands from being landlocked by private lands.

Many roads are shut down due to private property limiting the access. I say no more roads or improvements but also stop shutting down the access to the existing roads. Many lands are becoming landlocked by private land. (Individual, No Address - #A417.90110)

IN THE LOS PADRES NATIONAL FOREST

I used to live near the Los Padres National Forest. The vast majority of the forest in San Luis Obispo County is landlocked by private property. It is a lot of public land with no access unless you own the property next to it. It amounts to a strictly private use of a public resource. Sometimes the area of private property to cross to get to the National Forest would only be 50 yards or so. But no access is allowed. Many public roads go up to locked gates. In theory the reason we maintain the road is for fire suppression. What it amounts to is the government maintaining a private road. (Individual, Eagle River, AK - #A19687.91110)

1652. Public Concern: The Forest Service should maintain public rights-of-way through private property.

WHEN PUBLIC LAND IS BORDERED ON ALL SIDES BY PRIVATE LAND

I think that if public land is bordered on all sides by private land and the only access is through these private lands, the USFS should fairly and reasonably make access available for the general public. (Individual, Sidney, NE - #A4207.91110)

Our major problems were wealthy people, dude ranchers, and commercial outfitters buying or leasing private lands contiguous to public lands. Then they would attempt to block or gate historical roads/trails through prescriptive country, we often had to go to state or Federal courts to protect public access rights.

The problem has not gone away, and Public Land Access Association is active in several Western states. The administration should encourage the BLM and Forest Service to actively seek reasonable access to roadless public lands and enclosed private and state lands including condemnation procedures where necessary. (Individual, Bozeman, MT - #A13871.40300)

Also BLM land that is closed to public by being land locked by private land should have a right-of-way to it for public access. This is our land too! (Individual, Mill Hall, PA - #A7522.91110)

1653. Public Concern: The Forest Service should prevent private property owners from blocking access to other private inholdings.

One property owner was under the impression my southern neighbor was not allowed up the road (Trail 67). He placed a locked gate on the other road to my property thereby locking me out. When I cut the locks to gain access to my property, a criminal charge was filed against me for cutting the locks. From the sheriff's report, ". . . stated that the only reason he locked the gate was to keep the guy who lives in Walker . . . from driving up through his property which [this person] has been told by authorities that he is not allowed to do." The only authorities around are the Forest Service. The person in question does have a right to use that road. (Individual, Phoenix, AZ - #A29149.40000)

1654. Public Concern: The Forest Service should allow public access through private or tribal grazing allotments.

Private or tribal users of federal grazing cannot deny public access to public land. (Individual, Mesa, AZ - #A99.40000)

Maintenance of Routes through National Forest System Lands to Private Property

Summary

General Comments – A number of respondents write that the Forest Service should provide access routes across National Forest System lands to private inholdings. Suggestions for ensuring access include maintaining existing roads and historically accessible routes; establishing the shortest route; defining levels of vehicular access; patterning access routes after the National Park Service; allowing foot and horseback trails, or *only* foot and horseback trails; complying with Revised Statute 2477; training personnel regarding laws governing private property access; allocating more funds to preserve access; and refraining from creating small areas of protected roadless regions, particularly in areas adjacent to private property. People also suggest ensuring access through geodetic grid lines; through established access points; through non-motorized easements; and through airstrips and helispots. Some suggest that the Forest Service address this issue through the forest planning process; through meetings with individual stakeholders; through collaboration with county sheriffs; or by conducting a case-by-case access alternatives analysis for each inholding.

One association recommends that property owners be allowed seasonally unrestricted ground-based access within environmentally reasonable constraints. Some suggest that the Forest Service should grant access to property owners previously denied; should not require private property owners to comply with wilderness standards with regard to access; and should not require fees for access to private property. Finally, some suggest that the Forest Service should manage access routes in a way that contributes to a feeling of inaccessibility, and should block access to groups which damage the environment.

Road Construction/Maintenance – One individual suggests that the Forest Service should permit road construction to land "if the entity possessing the land owned the land prior to the government's ownership of surrounding properties." Several other respondents state that the Forest Service should not construct roads for the sole purpose of providing access to private inholdings. One individual asserts, "Private ownership doesn't mean the right to usurp the public's right to protected forests. If a stream is on my property, I shouldn't have the right to pollute it while it flows through my yard to the detriment of my neighbor. Likewise if a group owns land within a forested area, building a road to accommodate them at the expense of those who seek protection for the forest is wrong."

Road Construction/Maintenance – Funding – Several individuals state that private property owners should bear the cost of constructing or maintaining access roads. According to one person, "It is not the job of the federal government (taxpayers) to provide access to private property. The cost should be borne by those who benefit individually."

1655. Public Concern: The Forest Service should provide access routes to private property.

The Forest Service should work with private inholders of land to allow them access to their property and give them easements to their property.

No exceptions, the federal government should not devalue property by blocking access. The inholder should have the legal right of condemnation of the necessary easement for his usage, just as the government does when they want to widen the freeway or a county road. (Individual, Bozeman, MT - #A59.40000)

Those that reside in areas adjacent to roadless areas should/must not be denied access to their property. No one should ever intend for public policy that protects wilderness to keep a person from his private property. While it is reasonable that no new roads be built in a roadless area, it is not inconsistent to have a pre-existing route in the wilderness and the desire to protect that wilderness. (Individual, Murrieta, CA - #A367.40000)

On the question regarding public/private property rights . . . by all means those organizations/people/ governments should have complete unrestricted access to their land at any time without any intervention from big government. (Individual, Ogden, UT - #A590.40000)

BY MAINTAINING EXISTING ROADS

Roads allowing for inholding access should be maintained, but no new roads built. (Individual, Fayetteville, AR - #A1015.40000)

The Forest Service should not close existing roads that would deny access. If a private landowner closes part of a Forest Service road that crosses their property, the Forest Service should determine the importance of the road and build an alternative route if necessary to protect public access. (Individual, Tucson, AZ - #A4938.40400)

BY ALLOWING PRIVATE PROPERTY OWNERS TO BUILD ROADS

The best way to assure access to private property located within "roadless" areas is to permit property owners to build roads to access their properties. This does not mean the government should build the roads, but the Forest Service must not stand in the way with red tape. (Individual, Salt Lake City, UT - #A806.40000)

BY CONSTRUCTING LOW-IMPACT ROADS

Protecting access to property. This is a difficult question. Where such inholdings may be exchanged or purchased by the Forest Service, a less damaging solution is possible than the requirement to provide new access roads through roadless areas. Where this cannot occur, low impact roads may be necessary or permitted, if they can be built to a standard that protects watershed resources. (Individual, Grangeville, ID - #A728.40000)

"Build roads that are 'environmentally safe' (this can be done) to allow access. I suppose you could provide free helicopter service, or have a Sierra Club member volunteer to carry people like a large back pack to and from their property, but I think building a road that is not environmentally damaging makes more sense, and will be less costly (halting people from accessing their own property is a travesty)." (Individual, No Address - #A834.40000)

BY MAINTAINING HISTORICALLY ACCESSIBLE ROUTES

That property that has been historically accessible should usually remain so, or compensation should be provided. Property that has historically depended on the good graces of the Forest Service road program should be understood to have no inherent right to access in cases where those roads were built to be temporary. (Individual, New Haven, CT - #A616.40000)

BY ESTABLISHING THE SHORTEST ROUTE

People should have the closest, shortest route reasonable to their property not hundreds of miles around about to their property. (Individual, Turtle Lake, WI - #A6075.40400)

This area is steep mountain grades and there is a road used to provide a means for me to visit my neighbor. It used to take less than 5 minutes. Now, because of the Forest Service I must drive in a round-about way that is close to a 50-mile trip that takes 2-3 hours. (Individual, Phoenix, AZ - #A29149.40000)

BY DEFINING LEVELS OF VEHICULAR ACCESS

There is access and there is access. The policy question hinges on the right of access. If a person can only walk to their land—is that access? It is clear that law can limit people from using their land to the highest and best use, in that person's opinion. The same must have implications for the access issue. Should a court find that access by foot, is not adequate access for the enjoyment of the land, then the next step would be to define levels of vehicular access. There are undoubtedly such classifications. (Individual, No Address - #A781.40000)

BY PATTERNING ACCESS ROUTES AFTER THE NATIONAL PARK SERVICE

The "best" ways to implement the laws that guarantee states, tribes, organizations and private landowners access to property they own within roadless areas is to perhaps pattern after the National Park Service and the manner in which they work with those who have land within park boundaries. We have land within Glacier National Park and the partnership we have with them is very satisfactory. It is extremely important that management of private lands and access to them are consistent with the roadless objectives. (Individual, Coram, MT - #A539.40000)

BY CONSTRUCTING MINIMUM SIZED TRAILS

Reasonable access to property doesn't mean punching in a 40 ft. graded road through a previously roadless tract of land to appease some inholder. "Reasonable access" is a very ambiguous term and I believe the Forest Service should always in these instances defer to the "minimum tool" rule. An 18-inch trail to me can be justified as providing "reasonable access". (Individual, Challis, ID - #A16973.40400)

BY ALLOWING FOOT AND HORSEBACK TRAILS

Properties currently accessed by foot/horseback trails should also be allowed continued access, although trail maintenance through public land would become the (private property) owner's responsibility. (Individual, Vista, CA - #A4838.40100)

The best way to ensure legal access to private, tribal, or state land inside roadless areas is to allow foot and/or horse traffic anywhere within the areas. (Individual, Bozeman, MT - #A285.40400)

If the area is designated as roadless, inholders should walk or ride horses into their holdings. Much precedent for this has long been in effect in national parks. (Individual, Ennis, MT - #A102.40000)

BY ALLOWING *ONLY* FOOT AND HORSEBACK TRAILS

Legal access to private, tribal or state land within roadless areas should be available by foot or by horseback only. (Individual, Bozeman, MT - #A282.40400)

BY ENFORCING REGULATIONS

Access to private inholdings should be allowed on a minimum impact level. Regulations on violation should be heightened to prevent abuse by land speculators, as has occurred with wilderness inholdings near Vail, Colorado. (Individual, Spokane, WA - #A20648.40400)

BY COMPLYING WITH REVISED STATUTE 2477

If USFS personnel respect RS-2477 rights (including the Section 108 prohibition on changing the definition of an RS-2477), access to essentially all such property will be protected. (Organization, Tonopah, NV - #A20337.40100)

If extant RS-2477 rights-of-way and roads are respected, essential motorized access will remain available to essentially all private property and to nearly all of the forest around most communities. If the Forest Service refuses to recognize the RS-2477 status of double track dirt roads or interferes with their maintenance and repair by counties and individuals (which USFS is currently doing at a 130 year old Jarbidge Nevada road, thereby putting the Jarbidge residents at great risk of wildfires), much property will be destroyed, and many people will die in wildfires . . . . and you will be responsible. (Organization, Tonopah, NV - #A20337.35000)

BY TRAINING PERSONNEL REGARDING LAWS GOVERNING PRIVATE PROPERTY ACCESS

If forest staff members are unfamiliar with laws regarding access to private lands, training should be conducted to familiarize the staff with these laws. (Individual, Asheville, NC - #A22623.40100)

BY ALLOCATING MORE FUNDS TO PRESERVE ACCESS

We urge the Forest Service to spend more funds working with local governments to enact similar ordinances so that public access is protected. (Elected Official, Hailey, ID - #A4888.12313)

BY REFRAINING FROM CREATING SMALL AREAS OF PROTECTED ROADLESS REGIONS

Finally, the agency should refrain in the forest planning process from creating smaller pockets of protected roadless areas that cause access problems. (Permit Holder, No Address - #A5285.40000)

BY NOT DESIGNATING AREAS ADJACENT TO PRIVATE PROPERTY AS ROADLESS

Protecting access to private property can be done by not allowing an area adjacent to these private properties to be classified as roadless. (County Fire Department, Uintah County, WY - #A15287.40000)

ONLY IF PUBLIC ACCESS TO PUBLIC LAND IS PRESERVED

If the public is refused access to public forest property, then the property owners should also be refused access. The idea of private access or privileges in public or leased land is very unsettling to me! I can fish the river until I reach private property and then the water, streambed, and all that flows over it is no longer public until I reach another property line? Protect access to property unilaterally! (Individual, No Address - #A26741.40000)

ONLY IF PUBLIC ACCESS TO NATIONAL FOREST SYSTEM LANDS IN GENERAL IS PRESERVED

If the public is refused access to public forest property, then the property owners should also be refused access. Essentially, what is happening here, is that you are "condemning" property that the public owns and locking out the public landowners. (Individual, Annabella, UT - #A30323.40000)

WITHIN TEN DAYS OF A PROPERTY OWNER'S REQUEST

Local forests do not need any further laws to limit or hamper access to public lands for any user, organization, tribe, or private citizens. If access is needed to get to property then they should be granted access within 10 days of their request. All they need to do is follow local building codes and use standard road designs. Requiring private property owners to endure months or years of endless studies and appeals is not legal or moral. (Individual, Alturas, CA - #A28581.40000)

THROUGH GEODETIC GRID LINES

Provide reasonable forced access through the defined geodetic grid lines. (Individual, Sitka, AK - #A23579.40000)

THROUGH ESTABLISHED ACCESS POINTS

Access should be assured to the protected areas in the same fashion that we protect access to our California coastline. There must be designated entry points that allow for reasonable access, and all development must allow for these access points. These access points may involve roads leading up to, but not into the protected areas. Eminent domain may be employed to effect this access. (Individual, Santa Barbara, CA - #A504.40000)

THROUGH NON-MOTORIZED EASEMENTS

The best way to ensure legal access to private, tribal or state lands that are completely within roadless areas is to grant the concerned parties non-motorized access easements. The Forest Service should be responsible for designating, designing, building and maintaining access trails where necessary. (Individual, Bozeman, MT - #A3673.40000)

THROUGH AIRSTRIPS AND HELISPOTS

Any private property presently serviced by airstrips or helispots should be allowed to continue with that. Future proposals for airstrips should be granted within FAA guidelines, since backcountry airfields are generally small, have dirt, gravel, or grass surfaces, are useable only in daylight hours of summer and fall, and do not impact surrounding roadless areas to any substantial degree. (Individual, Vista, CA - #A4838.40100)

The best way to implement the laws that ensure States, tribes, organizations, and private citizens have reasonable access to property they own within inventoried roadless areas is, again, by using helicopters. (Individual, No Address - #A536.40400)

THROUGH AN EXCEPTION TO THE ROADLESS AREA CONSERVATION RULE

What is the best way to implement the laws that ensure States, tribes, organizations, and private citizens have reasonable access to property they own within inventoried roadless areas? Exception to the roadless ban should be made so these entities can access their lands. (Individual, No Address - #A850.40000)

To protect the reasonable access to property why not simply add a trailer on to the rule, and/or make an amendment to the rule that provides for the protection of the States, tribes, organizations, and/or individuals that need that protection. The determination and consideration of that protection could be initiated by the local districts, with regional approvals (but with a minimum of "red tape" attached). (Individual, Maricopa, CA - #A3732.40000)

THROUGH THE FOREST PLANNING PROCESS

There are more than 421,000 acres of private lands and 43,000 acres of state lands within inventoried roadless areas. The only reasonable place to resolve access issues is at the local planning level where state, county, and private owners can be notified and invited to provide input, and reasonable solutions can be developed based on their needs and rights to access. (Association, Colville, WA - #A3091.40000)

The current proposed plan also does not provide for access consideration to private and state lands within the inventoried roadless areas. This again should be resolved on a local forest level with all parties' rights to access recognized. (Individual, Pawleys Island, SC - #A6082.40000)

THROUGH MEETINGS WITH INDIVIDUAL STAKEHOLDERS

Contact stakeholders, on an individual basis if required, and see that their needs are met. (Individual, Tucson, AZ - #A936.40000)

THROUGH COLLABORATION WITH COUNTY SHERIFFS

Work with the County Sheriff, he is the protector of access on private property in the county even if it's on Forest Service land or roadless. (Association, Baker City, OR - #A7990.40000)

THROUGH THE NATIONAL FOREST MANAGEMENT ACT

NFMA is the focal point for protecting these routes to private and state lands. There is sufficient direction and flexibility in the regulation to do that. We only need to follow through and see that it happens. (Organization, Saint Anthony, ID - #A13225.40100)

BY CONDUCTING A CASE-BY-CASE ACCESS ALTERNATIVES ANALYSIS FOR EACH INHOLDING

Access to inholdings is important to the state of Nevada. We recommend a case-by-case access alternatives analysis be conducted for each inholding. These analyses should involve all property owners and other concerned stakeholders. Criteria should be established for finalizing access plans and the criteria should be used to strike a balance between minimizing adverse environmental impacts and minimizing access-related costs for property owners. (State Agency, Carson City, NV - #A17669.40100)

TO RESTORE THE PUBLIC'S FAITH IN GOVERNMENT

If for no other reason, honoring the access to the private properties can help to reverse the negative image that government has earned through decades of not being a good neighbor to the private sector. (Association, San Luis Obispo, CA - #A6984.40000)

WHILE PREVENTING ACCESS BY UNAUTHORIZED PARTIES

Again, the simple solution is to maintain standards, existing access to these tracts surrounded by federal lands. Issue federal easements to these owners and reduce this unnecessary headache that private citizens go through to access the property they duly and legally own. Put up locked gates and only allow those with legal access through the federal easement. It is totally unnecessary to quibble about private property access. Give it to them on a national easement level and be done with it. (Individual, Montrose, CA - #A370.40000)

IN ALASKA

There are limited private and state holdings in Alaska. It is critical that these lands have unrestricted access and unrestricted use. If areas surrounding the limited private and state lands are managed in a way that restricts use, the economy of the area will be adversely affected and citizens will be deprived of their rights to use the land for providing jobs and recreation. (Individual, Sitka, AK - #A12821.40300)

IN NORTH DAKOTA

The issue of access has been a contentious one between North Dakota counties and the Forest Service. If the Forest Service is serious about respecting access to property, it needs to adjust its policies to fit the facts and history underlying the acquisition of the lands now called the National Grasslands. Until the Forest Service does so, it cannot achieve this objective in North Dakota and will find itself at odds with the state and counties, not to mention the public.

Virtually all of the roads that the Forest Service to date claims the right to regulate are roads that provide access to private property. However, unlike land reserved for National Forests, these roads and road rights existed before the United States acquired the land and the orders approving the condemnation prove that the United States' title is subject to these rights. Thus, the Forest Service has no legal basis to regulate these roads. This situation further proves that to date, the roadless and related transportation policies have worked to deny access to private property, and in the case of North Dakota, have done so without sound basis. (Elected Official, McKenzie County, ND - #A27737.40000)

LANDS CONTROLLED BY THE STIMSON TIMBER COMPANY

Your letter dated July 19th: **Protecting access to property** USDA will ensure that states, tribes, and private citizens who own property within roadless areas have access to their property as required by existing law. This statement is false. Access is not available. Existing laws (regulations) are constantly being changed in favor of the government to continue denying access.

Stimson Timber has been trying to get access to their private property. Access was originally requested in 1992 when the land was owned by Plum Creek Timber Company. Stimson Lumber Company purchased the land in 1996 and has continued pursuing access.

As of today, July 29, 2001, Stimson still does not have access. Can you imagine the damage to the property from drought and insects that has happened and continues? The Priest Lake Ranger District advises that the EIS has been submitted for printing in the Federal Register. After it has been printed there will be another 45 days for public comment, and then another 45 days for any appeal.

The tangled red tape and unconscionable delays are unacceptable. The forests in the Western United States are constantly changing while your unreasonable rules and time delays deny property rights to those owning property in these forests.

After almost ten years Stimson still does not have access and the economic benefits that could have been enjoyed by the workers, and county and state taxes have been considerably diminished. (Individual, Boise, ID - #A2541.40100)

1656. Public Concern: The Forest Service should allow property owners seasonally unrestricted ground-based access.

WITHIN ENVIRONMENTALLY REASONABLE CONSTRAINTS

Property owners should have seasonally unrestricted ground-based access within environmentally reasonable constraints. Only property owners should have the legal right to appeal what they consider unreasonable constraints. (Association, Cody, WY - #A41559.40000)

1657. Public Concern: The Forest Service should provide access routes to state-owned lands.

IN MINNESOTA

The State of Minnesota and the MNDNR are keenly interested in issues affecting access to state lands. Maintaining access to non-federal working forests is critical to Minnesota's rural economy. The final RAC rule issued late last year substantially affected access to nearly 11,000 acres of state lands and nearly 15,000 acres of state-owned minerals within inventoried roadless areas. The MNDNR provided comments on the proposed RAC rule and DEIS in July 2000 and Minnesota Governor Jesse Ventura responded for the state to the Final EIS and preferred alternative last December. Copies of both letters are attached as background. (State Agency, Saint Paul, MN - #A28770.40000)

IN MONTANA

The state of Montana has experienced trouble in the past with obtaining access to state lands. For example, in a letter dated February 10, 2000 addressed to Region 1 Forester Dale Bosworth, the Montana Department of Natural Resources and Conservation noted difficulty in obtaining access to forested state trust lands across federal acres. In one of the most troubling projects, the state has been unsuccessful after six years of trying to obtain access for the Phoenix timber sale, which would cross a portion of the Beaverhead/Deerlodge National Forest. (Governor, State of Montana - #A17660.40100)

1658. Public Concern: The Forest Service should grant access to property owners previously denied.

Access to private property must be guaranteed, and access must be restored to property owners previously denied. (Individual, San Antonio, TX - #A6004.40000)

1659. Public Concern: Local authorities should determine permissible access routes to private property.

Free access should be allowed, determined by local authorities and not by the Forest Service. (Individual, Ogden, UT - #A494.40000)

The best way to implement the laws that ensure reasonable access to property within roadless areas would be to use a local council of governmental agencies to oversee the proper implementation and enforcement of access laws. (Individual, Boise, ID - #A674.40000)

Work with the County Sheriff he is the protector of access on private property in the county even if it is on FS land. (Individual, Baker City, OR - #A1038.40000)

1660. Public Concern: The Forest Service should manage access routes in a way that contributes to a feeling of inaccessibility.

Laws that ensure access to private properties landlocked within roadless areas must include parameters that dictate roadways be maintained as unobtrusively as possible. Grandfathered roadways in roadless areas must be managed in a way that contributes to the feeling of inaccessibility. Road building to access inholdings should be denied if possible. (Individual, Fairfield, VA - #A15817.40400)

1661. Public Concern: The Forest Service should not require private property owners to comply with wilderness standards.

WITH REGARD TO ACCESS

Access to private property should be in compliance with state laws. Private land owners should not be subject to the same ridiculous, discriminatory laws that apply to wilderness areas. Reasonableness and common sense in determining the least impact on federal lands, ensures the least cost to the landowner. The forest plan should spell out conditions of ingress and egress. (Association, Eureka, MT - #A17718.40100)

1662. Public Concern: The Forest Service should not require fees for access to private property.

Leave roads open. Require no fees to access a person's private property. (Individual, Mount Ida, AR - #A8739.40000)

1663. Public Concern: The Forest Service should block access to ecologically damaging groups.

Tribes and citizens with private property must be able to access their land, but only in a responsible manner. Organizations, more than likely, will be attempting to extract resources from their own land, and the Forest Service should not help, in any way, these organizations to further their scheme. While a private group's actions on private property is a whole other issue, the Forest Service should actively work to not provide access to ecologically damaging groups. (Individual, Akron, OH - #A17697.40400)

1664. Public Concern: The Forest Service should recognize that the Roadless Area Conservation Rule has no impact on access to state and private inholdings.

IN IDAHO

Nowhere in the information I have seen issued by the State of Idaho, through the Attorney General, the Governor or the Idaho Department of Lands, is there any specific problem presented by the RACR in regards to state access to its lands. The State of Idaho has made this issue of access very prominent but there is no proof there. The RACR maintains the current system of permitting access to state, private and

tribal lands. There is not a problem here that needs to be fixed. If the state, or any other entity, desires access to any of its lands through National Forest land it follows the existing procedures and if it is appropriate a road can be built, regardless if it is in a roadless area or some place else.

The Idaho Conservation League follows the issues related to roadless areas very closely and there is no specific problem in the RACR raised by anyone on access with any factual basis. This is a political whipping boy, without any practical merit that I can fathom. I hope these alleged problems are spelled out in this current ANPR process, otherwise it will be confirmed as nonsensical. (Organization, Boise, ID - #A20363.40100)

Road Construction/Maintenance

1665. Public Concern: The Forest Service should permit road construction to land that was privately owned prior to the government's ownership of surrounding property.

If the entity possessing the land owned the land prior to the government's ownership of surrounding properties, then I might be willing to consider some roads through the government-owned wilderness. (Individual, Columbus, OH - #A659.40300)

1666. Public Concern: The Forest Service should not construct roads for the sole purpose of providing access to private inholdings.

This is a nonsense issue. The only thing you could be referring to here is "private inholdings" in wild areas. I'm happy for people lucky enough to have such lands. But they have no right to expect the government to forfeit a common treasure (roadless wild areas) to subsidize the desires of an individual property-owner. If you're lucky enough to hold a few square miles in the middle of a wilderness area, you can walk to it, take a boat, or ride a horse. Just like the rest of us who travel through these areas. (Individual, No Address - #A49.40000)

Private ownership doesn't mean the right to usurp the public's right to protected forests. If a stream is on my property, I shouldn't have the right to pollute it while it flows through my yard to the detriment of my neighbor. Likewise if a group owns land within a forested area, building a road to accommodate them at the expense of those who seek protection for the forest is wrong. Who says landowners have more rights than citizens who pay the taxes that maintain and preserve federal lands? (Individual, Shawnee Mission, KS - #A96.40000)

As for people who own property in or near roadless areas, one can only assume that they were aware that the area was roadless when they made the purchase. Restricting construction of roads in these areas will maintain the character of the areas they purchased. It is NOT the responsibility or role of the government to change these areas by providing increased access. (Individual, No Address - #A621.40000)

1667. Public Concern: The Forest Service should address its contradictory statements regarding special use permits and public roads.

The Forest Service position that public roads require a special use permit under 36 C.F.R. [section] 251.110, is also without precedent. Special use permits are used for access granted by the Forest Service, not for valid existing rights, which predated land acquisition. The special use rules do not apply to public roads under the Federal Highway Act, 23 U.S.C. [section] 201. The Forest Service has represented to the public that the rules do not affect public roads, while telling county governments that no roadwork could occur without a special use permit. Letter of Lesley Thompson, August 1, 2000. These two positions contradict each other. This attitude and the underlying policy preclude the Forest Service from achieving the objective of protecting access to private property. Indeed, the agency's litigation position on this issue has reflected a concerted effort to deny access to private property. (Organization, Denver, CO - #A21358.40000)

Road Construction/Maintenance – Funding

1668. Public Concern: Private property owners should bear the cost of constructing or maintaining access roads.

It is assumed most of these entities have some sort of access to their properties already. Let them maintain that access at their own expense. (Individual, Anchorage, AK - #A518.40300)

Creation of new access roads should be a very last resort, only done when the letter of the law forces your hand. Property owners should shoulder the full cost if and when that happens, and roads must be as primitive as possible and be closed to public use. (Individual, Flagstaff, AZ - #A5026.40400)

It is not the job of the federal government (taxpayers) to provide access to private property. The cost should be borne by those who benefit individually. (Individual, No Address - #A1097.40600)

Legal Considerations

Summary

A number of respondents advise the Forest Service to ensure access to private property as required by existing law—specifically, the Alaska Native Claims Settlement Act, the Alaska National Interest Lands Conservation Act, and Revised Statute 2477 (see comments on these acts in Chapter 2: Other Legal Concerns: Federal Laws, Acts, and Policies). Some suggest the Forest Service review current laws governing private property access; familiarize personnel with laws regarding access to private lands; and disclose its legal obligation to provide access routes under existing laws since "it is misleading to the public to characterize lands burdened by statutory obligations to provide access to private inholdings, as roadless."

Several respondents comment specifically on the need to uphold valid existing rights. Some say the Forest Service should implement the Roadless Area Conservation Rule because it would adequately protect valid existing rights; others say the Agency should not implement the Rule because it would not protect valid existing rights.

Others discuss the appeals process as it relates to access. One association asserts that private property owners should have the right to appeal unreasonable constraints on access. Another individual states that the Forest Service should ensure consistent treatment of inholders with respect to the appeals process over the establishment of ownership rights. According to this person, "The proposed rule leaves complicated planning considerations, housing laws and social issues up to regional FS determinations. There are limited and complicated appeal processes unique to property within National Forests. The result is disparate treatment of inholders from a federal perspective."

1669. Public Concern: The Forest Service should ensure access to private property as required by existing law.

Access should be provided for within the laws the same way it has always been; evaluate the need and allow the type of access appropriate according to the need and the existing laws and guidelines. Do not make this concern any more significant than Congress does when it passes laws designating areas as wilderness. (Individual, No Address - #A1702.40100)

Access to state and private inholdings is already covered by other laws and regulations. No special provisions are needed. (Individual, Baltimore, MD - #A2321.40100)

Protecting Access to Property: I would hope you have no plans to terminate anyone's historic or deeded Right-of-Way to their property, without due compensation and due process of LAW. (Individual, Center Sandwich, NH - #A3669.40100)

It is misleading to the public to characterize lands burdened by statutory obligations to provide access to private inholdings as roadless. Many of the Chugach National Forest lands characterized by the rule as roadless are, in fact, burdened by obligations to allow roads to access private lands as promised by ANCSA, ANILCA, and the 1982 CNI Settlement Agreement. Failure to disclose these obligations to the public is intentionally misleading, creating false expectations to citizens and doing a disservice to private inholders. (Professional Society, Anchorage, AK - #A21707.40000)

BY ABIDING BY THE REQUIREMENTS OF THE ALASKA NATIVE CLAIMS SETTLEMENT ACT

The national forests in Alaska are different than other national forests in the U.S. in a number of ways, including laws unique to Alaska, like the Alaska Native Claims Settlement Act (ANCSA) of 1971. With the passage of ANCSA, 44 million acres of federal lands were made available for selection and conveyance to Alaska Natives in 12 regions of the state. Large tracts within both the Tongass and the CNF were made available to satisfy the ANCSA mandate, causing ANCSA Corporations to be effectively joined at the hip with the Forest Service in these regions. Despite the unique legislation enacted to allow ANCSA Corporations to realize the full economic benefits of their lands, obtaining access to its lands across CNF continues to be one of the most difficult challenges Chugach faces. The roadless rule, while acknowledging the existence of "valid and existing rights", does little to clarify those rights and if implemented, as a practical matter, would make obtaining such access even more difficult. (Tribal Corporation, Anchorage, AK - #A20340.40000)

BY ABIDING BY THE REQUIREMENTS OF REVISED STATUTE 2477

Private landowners within forest boundaries must be allowed ingress and egress (whether in a roadless area or not). This brings up another issue. That is RS 2477. Congress granted the states roads over the public lands. This cannot be taken away by declaring a roadless area policy. Any roads that the state or county maintains must be left open for their (constituents) use. (Individual, Miami, AZ - #A880.40100)

BY ABIDING BY THE REQUIREMENTS OF THE ALASKA NATIONAL INTEREST LANDS CONSERVATION ACT

Access to private property is provided for under provisions in the Alaska National Interest Lands Conservation Act (ANILCA), even in Congressionally-designated Wilderness Areas. There is no need to duplicate these provisions in a roadless rule. (Individual, Tacoma Park, MD - #A16325.40100)

ANILCA applies to all national forests and does not provide exception for specific categories of forestland, such as wilderness or inventoried roadless areas. Therefore, "the best way to implement the laws that ensure States, tribes, organizations, and private citizens have reasonable access to property they own within inventoried roadless areas" is for the Forest Service to comply with ANILCA. (Organization, Denver, CO - #A29624.40100)

BY ISSUING NON-APPEALABLE DECISIONS

If there are existing laws which GUARANTEE states, tribes, organizations and private land owners access to property they own within a roadless area, just allow them the access the law says they have by issuing a non appealable decision. Negotiation could be undertaken to plan location of roads and whether they could or should be closed after harvest. But following the law, there should be no denial by the Forest Service or appeal by disinterested parties. (Individual, Whitefish, MT - #A5102.40100)

1670. Public Concern: The Forest Service should review current laws governing private property access.

TO ENSURE THAT ACCESS IS MAINTAINED

There are currently laws on the books to allow reasonable access to private properties located in roadless areas; however, these laws are sometimes sporadically enforced or at least hindered by managers who don't agree with the right of private access. The current laws need to be evaluated to make sure that

access is guaranteed, in non-ambiguous language, and that anyone found violating or hindering the enforcement of these laws should be held accountable without regard to position, rank or influence. (Individual, No Address - #A28602.40000)

1671. Public Concern: The Forest Service should disclose its legal obligations to provide access routes under existing laws.

TO AVOID MISLEADING THE PUBLIC

It is misleading to the public to characterize lands burdened by statutory obligations to provide access to private inholdings, as roadless. Many of the Chugach National Forest lands characterized by the rule as roadless are, in fact, burdened by obligations to allow roads to access private lands as promised by ANCSA, ANILCA, and the 1982 CNI Settlement Agreement. Failure to disclose these obligations to the public is intentionally misleading, creating false expectations to citizens and doing a disservice to private inholders. (Professional Society, Anchorage, AK - #A21707.40000)

1672. Public Concern: The Forest Service should familiarize personnel with laws regarding access to private lands.

If forest staff members are unfamiliar with laws regarding access to private lands, training should be conducted to familiarize the staff with these laws. (Civic Group, Roanoke, VA - #A1713.40100)

1673. Public Concern: The Forest Service should consider that state statutes already ensure access to private property.

COLORADO STATE STATUTES

Colorado State Statutes already ensures access to property cannot be impaired, impeded or disrupted. Enactment of laws intended to perform a purpose, when existing laws already perform that purpose, only confuses legal matters. (Elected Official, Saguache County, CO - #A28774.40100)

1674. Public Concern: The Forest Service should uphold valid existing rights.

ON THE CHUGACH NATIONAL FOREST

Most of Chugach's economically viable lands are adjacent to or surrounded by national forest lands, providing Chugach with no practical means of access to these inholdings except across federal lands within the 5.5 million acre CNF, which is inventoried 98.9% roadless. When applied to roadless areas within the CNF, the potential for the Forest Service's proposal to facilitate efforts to frustrate or impair Chugach's valid existing statutory and common law rights of access to its land is abundantly clear. For this reason, it is imperative that the proposal recognize and preserve, through the implementation of appropriate procedures, the valid existing rights of access, both express and implied, that Chugach enjoys across national forest lands to its land holdings under the provisions of ANCSA, ANILCA, the 1982 CNI Settlement and the common law. (Tribal Corporation, Anchorage, AK - #A20340.20000)

1675. Public Concern: The Forest Service should implement the Roadless Area Conservation Rule.

BECAUSE IT ADEQUATELY PROTECTS VALID EXISTING RIGHTS

The January 12 rule provides protection for forest health, communities, homes and property and assures that the valid existing rights of individual landowners, states or tribes to access their lands will be honored. (Individual, Williamsville, NY - #A951.10152)

1676. Public Concern: The Forest Service should not implement the Roadless Area Conservation Rule.

BECAUSE IT WILL NOT PROTECT VALID EXISTING RIGHTS

The existing rule does not adequately assure that the valid existing rights of individual landowners, states or tribes have to access their lands will be honored. (Individual, San Antonio, TX - #A8983.10130)

1677. Public Concern: Private property owners should have the right to appeal unreasonable constraints on access.

Property owners should have seasonally unrestricted ground-based access within environmentally reasonable constraints. Only property owners should have the legal right to appeal what they consider unreasonable constraints. (Association, Cody, WY - #A26503.40000)

1678. Public Concern: The Forest Service should ensure consistent treatment of inholders with respect to the appeals process.

OVER THE ESTABLISHMENT OF OWNERSHIP RIGHTS

The proposed rule allows these decisions of fundamental rights of access to property to remain with local FS officials. This had led, and will continue to lead, to endless litigation between property owners and the FS just to maintain established ownership rights in the ever-changing FS regulatory environment.

In all cases the fundamental right of reasonable use and enjoyment or residential property should be assured. The proposed rule leaves complicated planning considerations, housing laws and social issues up to regional FS determinations. There are limited and complicated appeal processes unique to property within National Forests. The result is disparate treatment of inholders from a federal perspective. (Individual, Prescott, AZ - #A28094.13200)

Land Exchanges/Purchases

Summary

General Comments – One individual asserts that the Forest Service should cease acquiring more private property within inventoried roadless areas until it has regained control over other resources, such as its roads and maintenance backlog. Another person suggests that the Forest Service condemn private property located in roadless areas in order to obtain inholdings.

Land Exchanges – Several respondents suggest land exchanges of various sorts. Some suggest that the Forest Service exchange other federal land for private inholdings located in roadless areas. One individual recommends such land exchanges in order to prevent private interests from influencing management activities. "The presence of these inholdings," this person states, "gives private interests a disproportionate influence over the management of these National Forests." A timber association and state agency both recommend that the Forest Service exchange federal land outside of roadless areas for state lands within roadless areas. One individual suggests the Agency exchange other federal land for private inholdings located in wilderness areas; and another person advises against designating an area roadless unless all private inholders first agree to a land exchange.

Purchases – A number of respondents advise the Forest Service to purchase private inholdings—if the area is to be declared wilderness, or if other areas are to be reopened to multiple uses. According to one individual, "The Forest Service should aggressively buy and trade lands to rid roadless areas of private inholdings, and to build connections between roadless

areas and designated Wilderness areas." Another person suggests the Forest Service should either buy private property or negotiate an access schedule with property owners if traffic levels escalate the environmental impact of access.

One individual advises the Forest Service to purchase inholdings with land and water conservation funds. Another person advises against using Conservation and Reinvestment Act funding to purchase inholdings. Rather, says this respondent, "[CARA] Funding should be for the construction of new roads and old road maintenance should be sought after."

Other respondents discuss the purchasing process itself. One individual states that the Forest Service should not force private landowners to sell their property for the reason of obtaining inholdings. At the same time, others assert that the Forest Service should discourage private profiteering over the Agency's purchase of private property in roadless areas, and should not succumb to blackmail by private property owners who threaten to construct large buildings on inholdings. Finally, one special use permit holder says that the price of private property within roadless areas should reflect the presence or absence of an access route to the property.

Land Exchanges/Purchases General

1679. Public Concern: The Forest Service should cease acquiring more private property within inventoried roadless areas.

UNTIL IT HAS REGAINED CONTROL OVER OTHER RESOURCES, SUCH AS ITS ROADS AND MAINTENANCE BACKLOG

Until the agency has regained control over its resources, including roads and other maintenance backlogs, the Forest Service should avoid acquiring more property such as the private property within inventoried roadless areas. Access route maintenance must be a priority. (Individual, Des Moines, IA - #A12587.40500)

1680. Public Concern: The Forest Service should condemn private property located in roadless areas.

TO OBTAIN INHOLDINGS

Condemn the property and move them out. Or restrict the easement to the minimum to get to their property. Gate the easement, lock it so only the property owner has access (a visit to King Ranch in Texas will show you how to keep people out). (Individual, Tustin, MI - #A5276.40000)

Land Exchanges

1681. Public Concern: The Forest Service should exchange other federal land for private inholdings located in roadless areas.

Protecting Access to Property - I feel this is a "straw man" issue that has been raised by those that don't support the current rule. If roaded access is so critical why has it not already been developed? Land exchanges have long been successfully used in this area. Let's do more. (Individual, Peck, ID - #A1109.40000)

Conduct land trades for roaded areas to consolidate roadless areas. (Individual, Ennis, MT - #A438.40500)

Owners of non-federal lands that occur within important roadless lands, such as those in the Cabinet Mountains, near Libby, should be 1) offered a land exchange for the land in more accessible areas

without conflicting values; 2) offer the owners a fair market price for their land, then buy it from them; 3) if they won't sell or trade, allow them to access their lands without the aid of motorized vehicles and/or road building. If they won't abide by these options, condemn the land, pay them for it, then put the land into roadless federal land. (Individual, Libby, MT - #A14047.40100)

EXCHANGE PERIPHERAL FEDERAL LAND

As with existing wilderness areas, it is best if the owners of private inholdings can be offered attractive exchanges for property on the periphery of National Forest lands. In this manner easier motorized access to their property can be offered, if that is what they desire. (Individual, Louisville, CO - #A4486.40000)

If private access is not available to parties who own land within roadless areas either by river/trail aircraft or non road using transportation, then the agency should either purchase or trade for similar land outside the roadless area. (Individual, No Address - #A101.40000)

TO PREVENT PRIVATE INTERESTS FROM INFLUENCING MANAGEMENT ACTIVITIES

This question provides an opportunity, however, for me to express the view that the Forest Service should adopt a policy of eliminating these private inholdings by equitable land swaps or the exercise of eminent domain. The presence of these inholdings give private interests a disproportionate influence over the management of these National Forests. Inevitably, they skew management decision making along the lines revealed in question number four. A forest manager once suggested to me that fires on national forest land had to be suppressed in order to protect the tiny percentage of land on the forest owned by private interests. Otherwise they might sue! Nonsense. Save us all a lot of money and headache and just buy these people out. (Individual, Pendleton, OR - #A30482.40000)

1682. Public Concern: The Forest Service should exchange federal land outside roadless areas for state lands within roadless areas.

If access is limited or if the effects of federal policies preclude owners from effectively managing their lands within inventoried roadless areas, land exchanges may be necessary. This is the view of the state of Minnesota. Jesse Ventura, governor of Minnesota, stated in a December 5, 2000, letter to former Secretary Glickman in response to the state's inholding within roadless areas, "I request that the Forest Service assign a high priority to exchanging equivalent federal lands outside of the IRAs for state lands within these areas." Forest plan revisions present the best opportunity to discuss and resolve access issues. (Association, Duluth, MN - #A22631.40500)

BECAUSE THE CUMULATIVE EFFECT OF NATIONAL MANAGEMENT RULES WOULD PREVENT REASONABLE ACCESS TO INHOLDINGS IN ROADLESS AREAS

There are several interrelated National Forest rules that come into play in defining fair and reasonable access to non-federal lands. These include the Roadless Area Conservation Rule, the National Forest Transportation System Policy and Rules, the rules on Cost Recovery for Processing Special Use Applications, and the National Forest System Land and Resource Management Planning rules. Our conclusion was that the cumulative effect of these rules would preclude us from effectively managing state lands within the IRAs. Our suggested resolution was to pursue a land exchange. Where future management of IRAs as wilderness or unroaded areas precludes reasonable access (e.g., time, cost) to state lands, land exchange for federal lands outside the IRAs should be a high priority. (State Agency, Saint Paul, MN - #A30025.16100)

1683. Public Concern: The Forest Service should exchange other federal land for private inholdings located in wilderness areas.

Private land holdings within wilderness should be traded so that the wilderness is relatively free of such encumbrances. (Individual, Evergreen, CO - #A19178.35300)

1684. Public Concern: The Forest Service should not designate an area roadless unless all private inholders first agree to a land exchange.

If the entity or private property owner does not agree to a land exchange, the area should not be designated roadless. (Individual, Kalispell, MT - #A3380.40000)

Purchases

1685. Public Concern: The Forest Service should purchase private inholdings.

If they have an easement of record there should be no problem. A better way would be to purchase the land and do away with the problem. I can't think of a better use of taxpayers dollars. (Individual, Kalispell, MT - #A97.40000)

Also, outright purchase from willing sellers using the Land and Water Conservation Fund should be aggressively pursued. (Individual, Peck, ID - #A1109.40000)

Private inholdings are a broader issue best dealt with by buyout. (Individual, Granite Bay, CA - #A5166.40100)

I assume this question [5] is addressing the situation of an inholding property. These properties should be acquired by the federal government at any opportunity. The public should not be in the business of building roads so an individual can access property that more properly should be part of the surrounding wilderness. (Individual, Macomb, IL - #A95.40500)

IF THE AREA IS TO BE DECLARED WILDERNESS

Private land owners must be provided reasonable and appropriate access to accommodate the intended use of their land. If the area is to be declared Wilderness, attempts must be made by the government to acquire such private lands. Lands outside of Wilderness must be actively managed to maintain healthy timber stands and keep fuel accumulations within reasonable levels. It follows therefore that reasonable and appropriate private landowner access can be accommodated within these lands. (Individual, Manhattan, MT - #A21848.40000)

ONLY IF OTHER AREAS ARE TO BE REOPENED TO MULTIPLE USES

Private property rights are one of the cornerstones of this nation and their preservation should be a primary concern. The right to access one's private property should not be lost at the expense of maintaining the integrity of a so-called "roadless" areas. To purchase or to attempt to purchase in order to maintain the illusionary "roadless" character should only be done if other areas are to be reopened to multiple use and if the owner is truly interested and motivated to sell or exchange the parcel. (Individual, Denver, CO - #A5433.40100)

WITH LAND AND WATER CONSERVATION FUND MONEY

This is really tough—especially where there is a lot of checkerboard land. I recall one private parcel in the Crazy Mountains of Montana, a high elevation section that would have been a nightmare to build a road to. The owner was threatening to put in a subdivision and wanted roaded access, but the real agenda was to instigate a land exchange, whereby the forest would obtain the Goat Rocks section (thus sparing it from damage, to be sure), but in the process would have to give up a section of prime deer winter range on the margin of the mountains. Not a good deal for the public, either way. Probably the best way to handle it is to use Land and Water Conservation funds to purchase these inholdings. (Individual, Jackson, WY - #A10527.35300)

TO BUILD CONNECTIONS BETWEEN ROADLESS AREAS AND DESIGNATED WILDERNESS AREAS

It is very disingenuous to claim this as a serious issue. How many blocks of private land are actually surrounded by inventoried roadless forest? The Forest Service should aggressively buy and trade lands

to rid roadless areas of private inholdings, and to build connections between roadless areas and designated Wilderness areas. (Individual, Bozeman, MT - #A6189.40500)

IN THE TONGASS NATIONAL FOREST

I would like to see a more ambitious effort by TNF to acquire private inholdings in roadless areas, especially, the North Fork American. I like what they have done so far, and want them to do more. (Individual, Dutch Flat, CA - #A22445.35300)

1686. Public Concern: The Forest Service should either buy private property or negotiate an access schedule with property owners.

IF TRAFFIC LEVELS ESCALATE THE ENVIRONMENTAL IMPACT OF ACCESS

If high traffic levels in a particular area escalate the environmental impact of such access, you can review the matter and either buy the property or negotiate an access schedule with the owners. (Individual, Chestertown, MD - #A462.40000)

1687. Public Concern: The Forest Service should not use Conservation and Reinvestment Act funding to purchase privately owned forest lands.

Conservation and Reinvestment Act (CARA) funding should be reduced and restricted from purchasing privately owned forest near or within State or National Forests. Until the present Forest are managed correctly and an estimated $8.4 billion maintenance and reconstruction backlog as of January 2001 is caught up, in order to maintain the existing 380,000-plus mile road system to environmental and safety standards, there should be no "new" forest acquired by USDA Forest Service. Instead, funding should be for the construction of new roads and old road maintenance should be sought after. (Individual, Jefferson, OR - #A775.40500)

1688. Public Concern: The Forest Service should not force private landowners to sale their property.

FOR THE REASON OF OBTAINING INHOLDINGS

The rights to access private property should not be eliminated that predate all current laws, regulations, and designation of roadless areas. The USFS must abide by all existing applicable law in this manner. If private property within roadless areas is believed to be desirable for acquisition by the Forest Service, reasonable offers should be made to the owners. The sale of any private property within the National Forest should never be mandatory or coerced. (Individual, Edgewood, NM - #A5638.40000)

1689. Public Concern: The Forest Service should discourage private profiteering over the Agency's purchase of private property in roadless areas.

Existing rights to property within roadless areas is a difficult issue. I happen to know that one individual in my state of Colorado . . . makes a business out of profiting from purchases specifically within such areas, expressly for the purpose of forcing this issue. Such greed-motivated activity should be discouraged if not legislated against. (Individual, Denver, CO - #A20707.40000)

1690. Public Concern: The Forest Service should not succumb to blackmail by private property owners.

WHO THREATEN TO CONSTRUCT LARGE BUILDINGS ON INHOLDINGS

Buy them out wherever possible, at fair market rates for the type of property, but do not give in to property owners attempting to blackmail the Forest Service by threatening the construction of large buildings on inholdings. (Individual, Dallas, TX - #A18002.40500)

1691. Public Concern: The price of private property within roadless areas should reflect the presence or absence of an access route to the property.

When property is purchased inside of inventoried roadless areas, the property value should reflect the fact that road access is not an option. Otherwise the roadless designation becomes an economic bonanza to the property owner. Access should be the same kind as that enjoyed by the public. (Permit Holder, Rifle, CO - #A29619.40000)